

**Schedule of representations received at Sites and Policies pre-submission publication Aug-Sept 2013**

September 2013

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R083/C358	Merton Priory Homes	DM R1	DM R1: Location and scale of development in Merton's town centres and neighbourhood parades We note in item c) of the Policy the Council's proposed flexibility in applying the policy on amalgamation of existing units in Wimbledon, Colliers Wood and Wimbledon Village where such flexibility contributes to the council's regeneration objectives and trust that the regeneration proposals affecting MPH will also be treated sympathetically.	Noted with thanks
R069/C260	The Co-operative Group	DM R1	Draft Policies Map Morden C2 and policy DM R1: Location and scale of development in Merton's town centres and neighbourhood parades. The objection is based on: The existing Co-operative store should be identified as a mixed use development site (A1 to A5, D1 and D2 Uses); and The Co-operative store car park should be included within the designated neighbourhood parade.	Not taken forward. Ref: 12/p0493/New is a report completed after a pre-application meeting and does not represent planning permission. The applications would still need to gain planning permission before development could commence on-site. Neighbourhood parades are not recognised as town centres in the National Planning Policy Frameworks definition of town centres. As detailed in the retail policies in the Sites and Policies Plan, neighbourhood parades were designated to protect the uses that serve local essential needs such as convenience shops, GP's, post offices etc ...within walking distance of local residents. It is intended for neighbourhood parades to complement designated town centres to fulfil Merton's vision of ensuring that there are local facilities within 400 meters of every resident in Merton. Neighbourhood parades were designated so that the use (that meets local needs) will not change into residential use, for instance. The UDP and accompanying Proposals Map (2003) designated addresses rather than the uses that require protection. As part of the update work, based on extensive qualitative and quantitative research, proposed neighbourhood parades were designated. As mentioned at the pre-app, for the proposed mixed use to be acceptable, an impact and sequential test were required for our consideration.
R041/C130	Mayor's office for Policing	DM R1	Earlier representations sought flexibility within this policy seeking policing facilities to be located within high streets where appropriate. This would allow for public access points and front counters to be established in areas which are highly accessible to the public, meeting the aims of the MOPAC strategies. The GLA have published their Draft Town Centres SPG. This includes a section on Police Shop Units and paragraph 2.5.12 seeks the provision of a number of such units within each borough, either within standalone units within key retail frontages or community buildings. Policy DM R1 and R4 should therefore be revised to accommodate the GLA SPG and MOPAC strategies.	No amendment to this policy is required. Policy DMR1 relates to the scale and function of town centres and does not preclude policing facilities rather instead encourages community uses (which would technically include police shops) to Merton's town centres and neighbourhood parades.
R069/C257	The Co-operative Group	DM R1	Justification The site comprises an existing single storey Co-operative food store with a directly adjoining surface car park as identified below	Noted.
R069/C258	The Co-operative Group	DM R1	TCG is proposing the mixed use redevelopment of the entire site, both the store and car park, with a replacement food store, additional floor space for retail, commercial and/or community uses (A1 to A5, D1 and D2 Uses) and residential floor space above. The scheme, as detailed, was discussed at a meeting on 29 March 2012 and Merton's preapplication advice (Ref: 12/p0493/New) dated 25 April 2012 confirms "in principle" support for redevelopment as the site is on a sustainable location benefitting from good public transport accessibility and pedestrian access subject to consideration of the standard and appearance of the propose development and potential impact on the local area. These are issues that do not preclude the mixed use allocation of the site and are addressed by further policy and guidance.	Not taken forward Ref: 12/p0493/New is a report completed after a pre-application meeting and does not represent planning permission. The applications would still need to gain planning permission before development could commence on-site.
R069/C259	The Co-operative Group	DM R1	The emerging plan is not consistent with Merton's acceptance of the suitability of the site for redevelopment, does not best protect viability of the neighbourhood parade, meet the everyday needs of Merton's residents, make the most effective use of limited land available for development, diversify local community and complimentary uses and provide for linked trips within the parade.	Not taken forward. Ref: 12/p0493/New is a report completed after a pre-application meeting and does not represent planning permission. The applications would still need to gain planning permission before development could commence on-site.
R034/C111	Kames Capital	DM R1	The London Borough of Merton's adopted Core Strategy (July 2011) seeks to promote Colliers Wood as a 'district centre' in the London Plan hierarchy of centres. We support the Council's approach and formal designation of Colliers Wood as a district centre. Policy DM R1 of the Sites and Policies Plan seeks to <del>o-seeks</del> to maintain the viability of Merton's defined town centres. The Policy confirms that the Borough's town centres are an appropriate location for small, large, and major town centre type uses, including retail development. We support the aspirations of Policy DM R1 of the Sites and Policies Plan. The Policies Map (Submission Version) details the location and extent of the	Noted with thanks.

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			Borough's district centres, including Colliers Wood. We support the Colliers Wood District Centre boundary as set out on the Policies Map and Policies Map Town Centre Inset.	
<b>R069/C261</b>	The Co-operative Group	DM R1	The principle of redevelopment including store car park has been accepted and the proposed allocation and designated neighbourhood parade boundary should be revised to include the car park. Representations were submitted to the Sites and Policies DPD (2011) confirming the appropriateness of including the food store car park within the designation. The neighbourhood parade has been extended to include properties on the north side of Kingston Road but continues to exclude the car park.	The comments are dealt with in the council's responses in R069/C258 and R069/260.
<b>R069/C262</b>	The Co-operative Group	DM R1	The site has been accepted as appropriate for redevelopment and should be identified as a mixed development opportunity which can be delivered in 1-3 years. The designated neighbourhood parade boundary should be revised (see red line below) accordingly.	Noted - no amendments are required to site allocations or to the neighbourhood parade designations. The comments are dealt with in the council's responses in R069/C258 and R069/260.
<b>R081/C326</b>	Wimbledon Society	DM R1 (1)	The background to this very important section is that it is generally accepted that many of our Town Centres and Parades are in decline, and a new planning and management and traffic approach is now overdue. Without more innovative planning their future appears bleak, yet it is recognised that these centres form an important part of the life of the community, and help to create a focus for local identity. So the task for this new plan is to reverse this downward trend, & bring in some new thinking, re-energise our centres, building on the policy CS7 in the Core Strategy. CS7 says in summary: Wimbledon is a Major centre, then there are 3 District centres, and then 5 Local centres including Wimbledon Village, Raynes Park, Arthur Road. Outside those centres, town centre type uses are to be discouraged. CS Table 17.2 spells out in some detail how the Council wishes to see each type of centre accommodate various uses (retail, business, residential, culture, the wide range of other uses etc), as well as dealing with tourism and design. This table is clear and comprehensible, & should replace the current text. This would have the advantage of maintaining a common approach between the two documents.	Noted. Policy CS7: Centres of the Core Strategy is Merton's overall strategy for retail and town centre type uses in Merton. The Core Strategy forms part of Merton's local plan, and in accordance with the NPPf and guidance (as amended), does not need to be repeated in this document. The Core Planning Strategy, in addition to Policies DMR1 - DMR7 provides the overall strategy for Merton's town centres and neighbourhood parades. The council will consider ways of producing the information contained in the policies in a tabular form without losing the meaning or increasing duplication.
<b>R081/C327</b>	Wimbledon Society	DM R1 (2)	The land use policies at present are not very clear in this document, but appear to be: <ul style="list-style-type: none"> <li>• No loss of retail in Wimbledon's defined central shopping zone:</li> <li>• Defining Core retail frontages, where some non-retail uses are restricted to 50%:</li> <li>• Defining secondary retail frontages, where up to 50% non-retail can be accepted:</li> <li>• Accepting up to 70% non-retail in Neighbourhood Parades:</li> <li>• Other "in the centre" frontages where non-retail uses can be accepted:</li> <li>• Restraining the maximum sizes of retail &amp; other units: (these differ between centres):</li> <li>• Restraining amalgamations of small units into larger units:</li> <li>• Restraining the maximum sizes of commercial floorspace in some centres:</li> <li>• Preventing out-of-town &amp; edge-of-town retail centres, unless they are very small local shops providing local services: or sell goods of a very restricted kind:</li> <li>• Protecting corner shops:</li> <li>• Allowing temporary use of vacant shops for culture activities:</li> <li>• Encouraging cultural uses:</li> <li>• Accepting market stalls/street markets:</li> <li>• In addition, other issues for consideration are parking, public buildings/facilities and services, restaurants etc, residential/hotel etc uses, pedestrian/cycle facilities, links to public transport, pedestrianisation for special events (1.105) and urban design.</li> </ul>	Noted with thanks.
<b>R081/C328</b>	Wimbledon Society	DM R1 (3)	DMR1a(ii): The upper limit of 1,000sqm for a unit in Wimbledon Village should not be accepted, and is far too large: larger than any other retail unit locally. Part of the nature and character of the Village is the narrowness of the shop frontages, ensuring variety and individuality: and the smaller size of the units allows for a wider range of smaller firms to have a presence. Accepting this figure would: <ul style="list-style-type: none"> <li>(a) encourage in much larger retailers, creating bland frontages and changing the varied and small scale nature of the Village entirely; and</li> <li>(b) send the message that amalgamation of smaller units could not be resisted. The same is the case in Arthur Road. Therefore the references to Wimbledon Village &amp; Arthur Road should BE REMOVED. DM R1c: The reference to</li> </ul>	Noted - no amendments to policy are proposed. Part c) of DMR1 prevents the amalgamation of existing units in the high street in order to retain small units. Only new development up to 1,000 sqm that are commensurate to the scale and function of the area would be allowed in this location. There are existing units in Wimbledon Village and Arthur Road that are over 280sqm in floorspace. The council does not have evidence to state exactly where

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			Wimbledon Village here should BE REMOVED (page 14).	
<b>R073/C275</b>	Waitrose	DM R2	Waitrose recommends that within the proposed allocation for development of 'the intensification of sporting activity (Class D2 Use) with enabling development' should explicitly require any planning application for retail development to satisfy the retail planning policy tests included within Core Strategy Policy CS7 and emerging Sites and Policies Plan Policy DM R2. This is to ensure there is no ambiguity and that both the sequential test and impact assessments are carried out for any Town Centre uses in accordance with the National Planning Policy Framework (Paragraphs 24 and 26). This inclusion will ensure the Plan is 'sound' in accordance with the National Planning Policy Framework (Paragraph 182). It is therefore requested that the following wording be incorporated into any site specific policy: "Any retail development on the Site will be required to demonstrate compliance with Policy CS 7 and Policy DM R2."	Not taken forward. The council expects all site allocation proposals to comply with Development Plan policies (e.g. on affordable housing, retail, design, transport), unless explicitly stated. Repetition of this is deemed unnecessary. The council is not proposing to allocate this site for retail, nor would it be supportive of retail proposals that would be contrary to policy.
<b>R044/C138</b>	Merton Council Director of public health	DM R3	I am concerned that classes of retail outlets seem to be protected, even though they may harm health; for example corner stores that are able to survive only by selling alcohol. I too can see the value of corner stores for a number of reasons but we might want to think about rebalancing viability and vitality of centres with a concern for the health of our residents.	Not taken forward. Corner shops do not only sell alcohol but they also sell a wide range of convenience items such as bread, milk and butter as well as other food items that are required on a daily basis. The purpose of this policy is to ensure that all homes in Merton are within 5 minute walk of a local store that can provide essential daily items, should residents be unwilling or unable to travel by car to a town centre or larger store. It is considered that the policy position protecting corner shops to ensure that all of Merton's residents can walk to a local shop to buy essential daily food outweighs the potential that residents might buy alcohol from the same store to the extent that it harms their health.
<b>R044/C139</b>	Merton Council Director of public health	DM R4	I am concerned that retail outlets such as banks can change to betting shops with no further authorisation from government planners. This is something that needs to be watched as there is clear evidence that not only betting shops but also fast food, alcohol and payday loan outlets target deprived areas such as the east of Merton. Health and wellbeing need to be considered in every decision the Council makes. Health is a resource, along with economic opportunities that contribute to the overall wellbeing of our residents	Agreed and the council will continue to monitor the issue. Merton completed a research paper on betting shops for 28 February 2013 Licensing Committee. This paper identified the number, location and change over time of betting shops in Merton and explored whether the number of betting shops could be restricted through planning mechanisms such as developing planning policy or issuing an Article 4 Direction. This paper concluded that the evidence does not support the restriction of betting shops in Merton via the planning system. However, in conjunction with other London boroughs, the council will continue to ask government for betting shops to be put in their own Use Class without permitted development rights and will monitor change of use to betting shops. Using information contained in Merton's Annual Shopping Survey (2012), there were only 4 payday loan shops in Merton thus representing 0.02% of 264 A2 uses located throughout Merton. Again, the council will monitor change of use to money shops. Therefore, the council decided not to create a policy to restrict betting shops or money shops as the council's own evidence would not support the restriction thereof. The council's initial research on hot food takeaways however showed that there is a concentration of these uses on Merton High Street, the London Road (Mitcham) and Streatham Road. For this reason the council introduced a policy to prevent the over concentration of hot food takeaways on Merton's high streets.
<b>R083/C359</b>	Merton Priory Homes	DM R4	DM R4: Protection of shopping facilities within designated shopping frontages We welcome the proposed flexibility in shop front designations proposed at item 1.52 to cope more effectively with changes to the economy and shopping habits.	Noted with thanks

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R041/C131	Mayor's office for Policing	DM R4	Earlier representations sought flexibility within this policy seeking policing facilities to be located within high streets where appropriate. This would allow for public access points and front counters to be established in areas which are highly accessible to the public, meeting the aims of the MOPAC strategies. The GLA have published their Draft Town Centres SPG. This includes a section on Police Shop Units and paragraph 2.5.12 seeks the provision of a number of such units within each borough, either within standalone units within key retail frontages or community buildings. Policy DM R1 and R4 should therefore be revised to accommodate the GLA SPG and MOPAC strategies.	No amendments to this policy are required. These policies are actually more flexible than that set out in the UDP (2003) and allow community uses in the main shopping frontages of town centres subject to criteria, in addition to community uses being permitted in the secondary shopping frontages subject to criteria and in the non-designated shopping frontages. Again, community uses are encouraged to locate in Merton's town centres and neighbourhood parades (which would technically include police shops) to Merton's town centres and neighbourhood parades.
R083/C360	Merton Priory Homes	DM R5	DM R5: Food and drink/leisure and entertainment uses We welcome the balanced approach taken by the Council in this section, in the following initiatives: - • proposing opportunities for additional health club facilities in line with population growth (1.76) • the encouragement of restaurants, cafes, leisure and entertainment uses in areas where these are in short supply (1.77) • and the proposed restriction of concentrations of hot-food takeaways and promotion of healthier food options. We are particularly keen to see effective initiatives to promote healthy lifestyles available to residents in the poorer parts of the Borough. We also support the maintenance of existing leisure and entertainment facilities in Colliers Wood, Mitcham and Morden town centres (1.92)	Noted with thanks
R044/C140	Merton Council Director of public health	DM R5	Food and drink - Fast food outlets will be supported under certain conditions, as long as there is not an over-concentration. The definition seems to be not more than 3 in a parade of 10. It would be good to provide more specifics in this definition; for example, would this include a parade of shops opposite one that already has three. Further there is mention of allowing FFOs at the edge of town centres. I would be concerned that this encroaches on residential areas. There seems to be an interest in Fast food outlets, but not in controlling betting shops, payday loans and alcohol outlets, all of which have well researched evidence of negative impacts on health and wellbeing. I understand that other levers such as licensing in the case of alcohol can also be used to control the spread of these types of outlets.	Noted - no amendments to the policy are required. The 'over concentration' of hot food takeaways would be the development of more than three hot food takeaways in a shopping parade of 10 consecutive shops. This definition is clear as it implies these shops would need to be on the same street and therefore no example would be required. Allowing the presence of hot food takeaways across the street into consideration would, in the council's opinion be difficult to implement practically. The remaining comments are dealt with in the council's responses in R044/ C138 and R044/ C139.
R070/C269	The Theatres Trust	DM R6	Again, we support this thorough and detailed document, especially for Policy DM R6, but still have an issue with 'sui generis'.  Throughout the text, leisure and entertainment uses are designated as D2. Your two theatres are included in para.1.90 on page 35 under the sub heading of Protection of leisure and entertainment facilities and there is another section at para.1.109 on page 40 with a sub heading of Protection of arts, culture and tourism. But at no point is it explained that theatres are not D2, but sui generis – for clarity and accuracy this fact should be stated - probably in para.1.93 where community and cultural uses are designated D1!  The new paragraph at 1.110 – 2nd line from the bottom – 'revert back' is tautology – revert should be used on its own	a) Support for Policy DMR6 is welcomed. B) The reference to two theatres in paragraph 1.90 refers to 'the type of uses present in the cultural quarter' in Wimbledon town centre. To improve clarity, the council proposes to add a footnote to reference paragraph 1.88 that " <i>Theatres are sui generis uses and are dealt with in Policy DM. R6</i> ". In paragraph 1.75 and 1.77 it is clarified that what is meant by leisure and entertainment uses is uses within the D2 Use Class. C) Agreed - grammatical correction taken forward .
R083/C361	Merton Priory Homes	DM R6	DM R6: Culture, arts and tourism development We note and support the Councils proposal to encourage arts, culture and tourism uses in the Merton economy and welcome the value this could add to the local economy and employment prospects for local people.	Noted with thanks
R081/C329	Wimbledon Society	DM R6	DMR6: CULTURE ARTS & TOURISM on page 37 4 This Policy is drafted in terms of regulation and, to some extent, encouragement, of cultural and arts activities. The Society considers that the Council should surely have far more pro-active policies, expressed either here, or in DM C1. There should be a positive Policy of developing the area between the Theatre and the Polka Theatre as a "Cultural Quarter". Specific projects the Council should play an active part in, include provision of a new performance space to replace the Civic Hall, which was demolished to make way for a shopping area in the 1980's: (see comments on site 01, page 334): and also: Development of the "Wimbledon Way" pedestrian route. This is seen as an Olympic legacy project of 2012 metres length, following the encouragement given to better pedestrian access to the AELTC for the Olympic tennis (see comments on 25TN on page 151). A range of public realm improvements have been proposed, and the first elements are already in place. The route is already shown on the Council's street plans, and runs between the Station and the AELTC. It could later be extended to the east to reach the Polka Theatre and to the west to the Common and the Windmill.	Not taken forward in this policy. As illustrated in Merton's Core Planning Strategy policy CS6 "Wimbledon" (c) and on the Wimbledon sub-area diagram, a cultural quarter is already recognised in the Local Plan at this end of The Broadway. The majority of this end of the Broadway area is located in the secondary shopping frontage where a wide range of uses are encouraged therefore a new policy is not required. Similarly, the creation of a Civic Hall in Wimbledon town centre and Wimbledon Way do not require policies. The Wimbledon Way is a heritage walk in and around Wimbledon town centre set up to celebrate the Olympics. There is a plan for this project with initiatives set out. Although the council does not intend to build a new Civic Hall; the site allocations in Wimbledon allow for this, should another party want to take it forward.

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R081/C330	Wimbledon Society	DM R7	The Policy rightly refers to their contribution to town centres, but there is no policy reference to ensuring that they are sited accordingly. ADD a new policy at 1.114(c) "NEW MARKETS SHOULD BE SITED WITHIN A TOWN OR LOCAL CENTRE".	Not taken forward. Merton's Technical Officer for Street Trading confirmed that permits have been issued for markets outside town centre boundaries, in particular mobile markets. Furthermore, Merton's has market stalls both inside and outside of town centres. Merton also has a very few active markets. This policy is for all markets in Merton regardless of their location.
R089/C456	Internal	DMR1	Pg 14 - "Neighbouring" should read "neighbourhood".	Incorrect word for sentence
R089/C457	Internal	DMR1 - R7	Typos, Capital Letters and changes to '.' and ',' throughout the document.	Typos
R089/C406	Internal	DMR2	1) Formatting c) ii. Location of "And". 2) Para 1.27 refers to Appendix 6 - this should be replaced with Appendix F. 3) Para 1.28 delete the following from this sentence and 10 minute walk (800 metres).	Updated Policy.
R089/C407	Internal	DMR3	1) Para 1.39 - capital 'In'. 2) Paragraph 1.37 made changes to provide more clarity on the changes to the GDPO. 3) Inserted "when adopted" after "Design SPD".	Updated Policy.
R089/C408	Internal	DMR4	1) Paragraph 1.46 made changes to provide more clarity on the changes to the GDPO.	Updated Policy
R089/C409	Internal	DMR5	1) Paragraph 1.85 made changes to provide more clarity on the changes to the GDPO. 2) Insert the word 'Policy' before E3.	Updated Policy.
R089/C410	Internal	DMR6	1) To policy aim, make the following change: "By recognising the value of arts, culture and tourism uses to Merton's economy and employment, the council aims to protect and provide additional arts, <del>culture and tourist</del> and <del>culture</del> uses in the borough". 2) To part F of the policy, to insert the following word in red: "f) <b>Subject to Policy DMR3</b> , protecting, maintaining and encouraging the work-space needed to support creative and cultural industries across the borough".	1) To policy aim, make the following change: "By recognising the value of arts, culture and tourism uses to Merton's economy and employment, the council aims to protect and provide additional arts, <b>culture and tourist</b> and <del>culture</del> -uses in the borough". 2) To part F of the policy, to insert the following word in red: "f) <b>Subject to Policy DMR3</b> , protecting, maintaining and encouraging the work-space needed to support creative and cultural industries across the borough".
R083/C363	Merton Priory Homes	DM H1	DM H1: Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system. We note the contents of this section and look forward to working with the Council to assist in meeting identified needs for supported housing in Merton. The ongoing revenue funding for this provision will need to be considered to ensure proposed supported housing project remain viable in the long term.	Comment noted.
R081/C321	Wimbledon Society	DM H1-H5	A general policy on Housing is surely needed (as none is provided in the Core Strategy), that will provide the context for the detailed policies.	Not taken forward. Merton's Core Planning Strategy provides three strategic policies on housing CS8 (housing choice), CS9 Housing provision) and CS10 (accommodation for Gypsies and travellers). It is our view that these provide extensive context for the detailed policies.
R083/C364	Merton Priory Homes	DM H2	DM H2 Housing Mix. We note the Borough level indicative proportions with regard to housing mix in clause 2.34 and that clause 2.36 provides for some flexibility in the implementation of the proportions though putting the onus on developers to demonstrate why exceptions might be required. On potential regeneration sites, unit sizes will be governed largely by the needs of existing residents who will have the right to be re-housed on the estate. We trust that the Council will consider these as satisfactory grounds on which to grant exceptions to the proportions in 2.34.	Comment noted.
R022/C064	English Heritage	DM H2	Policy DM H2 Housing, we previously raised concern in respect of the policy statement that permission for housing would be granted if it contributes to the needs of different households. We are pleased to note this has been changed to Residential development will be considered favourably where they contributes to meeting the needs of different households etc..	Noted with thanks
R022/C065	English Heritage	DM H2	Policy DM H2 Housing, we previously raised concern in respect of the policy statement that permission for housing would be granted if it contributes to the needs of different households. We are pleased to note this has been changed to Residential development will be considered favourably where they contributes to meeting the needs of different households etc..	Noted with thanks
R081/C322	Wimbledon Society	DM H2	The Society has noted that the Council has received a number of applications for the re-conversion to single dwellings of houses that have, in the past, been split into a number of flats. This is leading to the loss of useful housing units, at a time when there is a shortage of housing, and when policy dictates that London's population will continue to grow. The Council's response has been to say that they will keep a watch on the situation - presumably with a view to possible action in the future. In the Society's view the evidence of loss of housing is already clear, and the opportunity to develop a policy to deal with this situation should not be missed. The present Policy wording does not give intending developers a clear idea of what the Council expects, and an easier	Merton's Core Planning Strategy CS.9 states " <i>we will... not support proposals that result in a net loss of residential units or net loss of affordable housing units</i> ". The council recognises that some re-conversions have resulted in a loss of units and it may be that particular material considerations pertaining to these planning applications have overridden council policy on those occasions. The council will continue to monitor the situation.

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			to understand approach should be produced. (see for example the table at 2.34) Paragraph 2.37 (gated communities) seems to have no place in a policy on Mix, and should be located elsewhere in the document, perhaps in a new general policy.	
R027/C082	GLA	DM H3	13. The document's approach to affordable housing is not in general conformity with the London Plan and is not a basis for informing sites and policies on affordable housing. It is disappointing to see that the Council has not addressed the strategic issues raised by the GLA at the previous stage 3 consultation in respect to limiting average rent levels on the affordable rent product. As stated in our previous responses, setting rent caps on affordable rent (including re let conversions) at 65% of market rent could constrain delivery and prevent the maximisation of affordable housing delivery. 14. The London Plan Revised Early Minor Alterations (REMA) and the revised London Housing Strategy emphasise that the priority for affordable housing is maximising supply and increasing delivery, having regard to the availability of resources. The Secretary of State's letter of 13 August 2013 which supports the publication of REMA also states that "imposing rent controls through local planning policies would inter this objective and risk letting Londoners down by limiting the supply of affordable housing, and reducing the choice for tenants." The nationally set definition of the affordable rent product as set out in the National Planning Policy Framework makes clear that affordable rent is up to 80% of market rent. 15. Merton Council's Policy DM.H3 'Support for affordable housing' and justification text which seek to impose local, lower rent ceiling through the planning system would compromise the flexibility necessary for the product to deliver affordable housing in different circumstances and in turn will not be compliant with national guidance and would not be in general conformity with the London Plan (Policies 3.11 & 3.12). 16. Officers would welcome further discussion regarding this non-conformity issue with the Council prior to its Examination in Public.	Agreed. After careful consideration the council is proposing to amend policy DM.H3 to bring it into general conformity with the Mayor's London Plan on this matter. We are proposing the following amendments to 2.42 <i>There is a wide variation in market rents in Merton. Homes with a rent of up to 80% of market rent could prove unaffordable to applicants in housing need, particularly those needing family-sized homes. In dealing with individual planning applications the council will have regard to a number of considerations including Merton's Housing Strategy, and Merton's Interim Policy Statement on Affordable Rent (07 November 2011) and the Council's Merton's draft Tenancy Strategy (November 2012). In accordance with Merton's Housing Strategy, the council will only support new housing schemes in Merton where average rent levels across all bed sizes do not exceed 65% of market rent, unless registered providers can demonstrate exceptional circumstances. Affordable rent levels for any bed size must not exceed 80% market rent or 65% for larger homes with three or more bedrooms. Affordable rent for all re-let conversions should not exceed 65% of market rent</i>
R083/C365	Merton Priory Homes	DM H3	DM H3 Support for Affordable Housing We note that in item 2.42 there is a requirement that average rent levels across all bed sizes for affordable rent tenure on a scheme should be no greater than 65% unless registered providers can demonstrate exceptional circumstances. We also note the Council's proposed policy that affordable rents should in any case not exceed 65% of market rent for larger homes with three or more bedrooms. Whilst we appreciate that affordability of larger family housing is an important issue we would caution against an absolute cap on all larger family housing at 65% as this might affect viability of schemes in areas where market rents are lower than average for the Borough.	Policy proposed for amendment. After careful consideration the council is proposing to amend policy DM.H3 to bring it into general conformity with the Mayor's London Plan on this matter. We are proposing the following amendments to 2.42 <i>There is a wide variation in market rents in Merton. Homes with a rent of up to 80% of market rent could prove unaffordable to applicants in housing need, particularly those needing family-sized homes. In dealing with individual planning applications the council will have regard to a number of considerations including Merton's Housing Strategy, and Merton's Interim Policy Statement on Affordable Rent (07 November 2011) and the Council's Merton's draft Tenancy Strategy (November 2012). In accordance with Merton's Housing Strategy, the council will only support new housing schemes in Merton where average rent levels across all bed sizes do not exceed 65% of market rent, unless registered providers can demonstrate exceptional circumstances. Affordable rent levels for any bed size must not exceed 80% market rent or 65% for larger homes with three or more bedrooms. Affordable rent for all re-let conversions should not exceed 65% of market rent</i>
R089/C411	Internal	DM H4	Addition to sustainability appraisal section (in red) for clarification <b>It is considered that there are no material social, environmental or economic benefits from the demolition of a structurally sound single dwelling and its replacement with another single dwelling.</b> This policy meets a number of sustainability objectives including natural resources and climate change by helping to compensate for resources lost through demolition and rebuilding of single dwelling houses.	Addition to sustainability appraisal section (in red) for clarification <b>It is considered that there are no material social, environmental or economic benefits from the demolition of a structurally sound single dwelling and its replacement with another single dwelling.</b> This policy meets a number of sustainability objectives including natural resources and climate change by helping to compensate for resources lost through demolition and rebuilding of single dwelling houses.
R081/C323	Wimbledon Society	DM H4	It has been the Government's intention that Code level 6 should apply from 2016, which is only a year or two after the Policies in this document will come into effect. This Policy should therefore recognise this and provide for an increase in the Council's required Code (5) level, when the Government introduce the higher figure. As this Policy applies only to total demolition, it is likely to be open to avoidance by developers, and additional criteria should be included. There have been several recent cases where demolition of a structurally sound house has been very extensive but not complete; where a small portion of the front facade is retained, ostensibly to protect the street scene. The result is a virtually new house but built to a lower Code level. To achieve the Council's aims on sustainability, the policy should apply to houses where the demolition is more than 50%, rather than total demolition. ADD: DMH4(d): "THE POLICY WILL BE APPLIED TO HOUSES WHERE MORE THAN HALF OF THE HOUSE IS TO BE DEMOLISHED".	Agree with principle of this change. Proposed addition to the justification of DM. H4 (last paragraph) <b>This policy will also apply in cases where a substantial amount, but not all, of the original single dwelling house is demolished and rebuilt as a single dwelling (for example, where the original facade is required to be retained). If the project is required to adhere to the part of building regulations relating to new build (as opposed to refurbishment), currently known as Building Regulations Part L approved document A (New Build) then the council would expect this policy to be applied.</b>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			The same policy should also apply to the demolition of two semi-detached (or adjoining) houses, as to a single house.	
<b>R027/C086</b>	GLA	DM H5	17. The amendments to the Policy DM.HF Student Housing is still considered unsatisfactory to address the issue raised in previous representations. The borough should not restrict student housing provision to meet the needs of particular boroughs but should meet strategic needs as well as local ones in line with London Plan Policy 3.8 Housing Choice. It is therefore suggested that the reference to specific south London boroughs in paragraph (vii) be removed and replaced by "caters for recognised educational establishments within a reasonable travelling distance."	We propose to take forward the modification to DM.H5 (v.ii) caters for recognised educational establishments within Merton or neighbouring south London boroughs of Croydon, Lambeth, Kingston-upon-thames, Richmond, Sutton and Wandsworth to replace the existing text here with " <i>caters for recognised educational establishments within a reasonable travelling distance</i> ". It is the council's view that Policy DM.H5 proposes to help meet the needs for student accommodation of a quarter of London's boroughs meets strategic as well as local needs and is therefore in line with London Plan policy 3.8 Housing Choice. However the council also agrees with the Mayor's proposal in paragraph 17 that travelling distance between the educational establishment and the student accommodation is a more sustainable method of planning for student accommodation.
<b>R083/C362</b>	Merton Priory Homes	Housing - GnT	Housing (page 47) – Accommodation needs of gypsies, travellers and travelling showpeople MPH acknowledges our partnership with the Council in meeting the needs outlined in this section and we look forward to continuing this work.	Noted with thanks
<b>R089/C412</b>	Internal	Housing para 2.77	pg 48, change "ad" to "as"	Factual change
<b>R038/C122a</b>	London Gypsy and Traveller Unit	Position statement on gypsies and travellers	In our view this is not a robust assessment of need and it does not provide sufficient evidence to support the policy statement in the Sites and Policies Plan. We are also concerned that the waiting list for pitches is not maintained effectively and further discourages Gypsies and Travellers from accessing pitches in Merton. None of the 6 residents who were identified as in need in 2011 were registered on the waiting list.	It remains the council's view that the research the council undertook is effective and robust. The council has undertaken primary research (the event hosted by the G&T group, assessment of and interviews with households on site) secondary research, (assessment of the Census and other available data) and co-ordination with neighbouring boroughs. The co-operation with other boroughs demonstrates that our findings are similar to others in south London (e.g. Wandsworth). Merton's G&T pitch waiting list can be applied for by informing the council or Merton Priory Homes that a person or household wants to be on the list; it is not mandatory to fill in a form in order to join the list in order to make it as straightforward as possible and not present barriers in terms of literacy levels or reluctance to provide information to authorities. Research responses are anonymous; the council does not use responses provided in this way to offer council services.
<b>R038/C122c</b>	London Gypsy and Traveller Unit	Position statement on gypsies and travellers	In particular, we object to the process of filtering down the responses so that in the final analysis only 6 out of 36 responses are taken into consideration. The filtering only includes responses from Travellers who provided verifiable bricks and mortar addresses in Merton. This excludes those not currently resident in Merton. Furthermore, from our experience in working with this community, Gypsies and Travellers are generally reluctant to provide such information to the authorities. This filtering process has excluded a significant number of Merton Travellers from the final analysis, as only 13 out of 19 responses were considered when assessing the level of need.	Disagree. On the advice of the local Gypsy & Traveller group that led on the organization of the event, we encouraged anyone to attend the event and we did not restrict attendance of the research event to our target population only (i.e. Gypsies & Travellers living in Merton). Therefore it is necessary to disaggregate the data to ensure that the requirements of people who do not identify themselves as Gypsies & Travellers and those who do not reside in the borough are separated from those of our target population (Gypsies and Travellers living in Merton). All 36 responses were considered in the analysis, the analysis found that 6 respondents from our target population had identified 'a lack of sites' as the reason for living in bricks and mortar housing.
<b>R038/C122d</b>	London Gypsy and Traveller Unit	Position statement on gypsies and travellers	There is then further filtering based on an assumption that differentiates between 'cultural preference' to live on a site and 'actual need'. Although the majority of respondents (91%) rated living on a site as essential, important or very important, this was not considered when identifying the level of need. A question regarding the reasons for not living on a site was used to determine how many households would require living on sites. Only the responses of 6 Merton residents with verifiable addresses were taken into account.	It is common practice, and often advised by research experts that, questionnaire surveys adopt a funnel approach, where broad and general questions are asked at the beginning as a warm-up, before moving on to more specific questions. The question that asked respondent to rate living on site as essential, important or very important is a general one, which aimed to gather the respondents' opinion on the importance of site living for the Gypsy & Traveller community as a whole, rather than the specific requirement of that person or household that would inform pitch target setting.

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R038/C118	London Gypsy and Traveller Unit	Position statement on gypsies and travellers	As stated in our previous consultation response, the Sites and Policies Plan should seek to meet the need identified in the 2008 London GTANA of 4-16 pitches by 2017, by allocating sites for Gypsy and Traveller accommodation or integrating Gypsy and Traveller pitches on larger housing development sites. With regards to the emphasis on the needs of housed Gypsies and Travellers, we would point out that many Travellers in London have been forced into bricks and mortar against their will because of lack of adequate site provision and their needs should be included in any assessment of need. We therefore recommend that the maximum level of need identified in the London GTANA (16 additional pitches by 2017) is used as the baseline figure to inform the Site and Policies DPD. We agree that the accommodation needs assessment should be reviewed on a 5-year rolling basis after this backlog of need is met.	Not taken forward. The 2008 London GTNA is based on data from 2007. It is out of date. The methodology has been challenged by the Mayor of London, who has concluded that GTNA should be undertaken locally. Merton has undertaken more up-to-date, thorough, local assessment of the gypsy and traveller population in Merton, and co-ordinated with neighbouring boroughs. It is this up-to-date local assessment that has been used to inform Merton's Sites and Policies Plan.
R038/C121	London Gypsy and Traveller Unit	Position statement on gypsies and travellers	Finally, we would like to attend the Examination in Public hearing session regarding Gypsy and Traveller provision in order to present evidence on this issue and participate in the debate.	Noted
R038/C122b	London Gypsy and Traveller Unit	Position statement on gypsies and travellers	In our response to the previous consultation on the Merton Sites and Policies DPD we raised a number of concerns regarding the level of need identified in the Merton Gypsy and Traveller Accommodation Needs Assessment from 2011, the lack of a 5-year land supply for Gypsy and Traveller sites and the Duty to Cooperate with neighbouring Boroughs, the Gypsy and Traveller community and support organisations. In June 2013, the London Gypsy and Traveller Unit discussed these concerns at a meeting with Merton Planning Policy officers. The notes from the meeting together with our previous consultation response are attached to this submission as further evidence. Although this meeting clarified a number of issues raised in our previous consultation response, we are not convinced the approach taken by Merton Council regarding provision for the Gypsy and Traveller community is a sound and positive strategy consistent with the requirements of the Planning Policy for Traveller Sites.	Noted. It is the council's view that Merton's approach to accommodation provision for the gypsy and traveller community is a sound and positive strategy consistent with the requirements for government guidance on planning policy for traveller sites and extensive local evidence.
R038/C120	London Gypsy and Traveller Unit	Position statement on gypsies and travellers	We do not consider that Merton is in compliance with the Duty to Cooperate. Though Merton held discussions with neighbouring Boroughs through the sub-regional housing partnership, the Councils decided not to take a joint approach on the issue of Gypsies and Travellers. As a result, Merton has not shared with other Boroughs the data from their research concerning families in need who live outside of Merton and neither have other Boroughs shared data they may have collected concerning Merton residents. At our meeting with Merton officers on 12 June 2013, they agreed to seek a meeting of the Gypsy and Traveller sub-group of the sub-regional housing partnership. As of the date of this representation, no feedback has been provided on when or whether the Gypsy and Traveller sub-group will convene.	Disagree. The council has complied with the duty to cooperate. Merton Council has taken the lead in organising a Gypsy and Traveller needs assessment workshop for the seven London boroughs (Sutton, Richmond, Kingston-upon-Thames, Wandsworth, Croydon and Merton) to cooperate in assessing G&T needs sub-regionally, even though the Mayor is clear that this should be dealt with locally. The first workshop took place on 21 August 2012. Subsequent cross-borough engagement took place throughout Merton's plan-making, between planners and also between housing colleagues and land and property officers. The most recent meetings took place in August and September 2013. Each borough is at a different stage of local G&T needs assessment and plan making. In addition, the evidence presented from the boroughs that have carried out local assessments (such as Merton) does not show that G&T needs are uniformly characterised across south London boroughs. Therefore the boroughs have decided to continue to undertake local assessments and co-ordinate results. No evidence has been presented to any of the south London boroughs (particularly Wandsworth and Merton who are at a similar plan-making stage) that demonstrates that this approach is unsound.
R038/C117	London Gypsy and Traveller Unit	Position statement on gypsies and travellers	We would like to make the following comments on the Merton Submission Draft Sites and Policies Plan regarding the Position Statement on meeting the accommodation needs of Gypsies and Travellers in conformity with the Planning Policy for Traveller Sites. We hope that the format of our response and our consideration of the tests of soundness (which we do not feel are met) is appropriate. We could find no pro-forma, or guidance about regulations that need to be followed, on Merton's website and we would ask the Inspector to take this into account.	Noted
R038/C119	London Gypsy and Traveller Unit	Position statement on gypsies and travellers	While the Position Statement on Gypsy and Traveller accommodation does not set pitch targets and assumes the need for 4 public pitches will be met through site turn-over, it recognises the need to identify land for 2 pitches to meet the need of Traveller households who are current bricks and mortar homeowners. However, the document does not make a site allocation for this purpose, on the grounds that no suitable sites have been identified in the assessment against PPTS and Merton Core Strategy criteria. This site appraisal has not been published on the Council's website as part of the evidence base and therefore we are not convinced this approach is sufficiently justified. We would wish to request for this information to be made public as part of the Examination of the Sites and Policies Plan. We are concerned that Merton has not made a site allocation because a) it holds the view that it is the responsibility of individual Gypsies and Travellers to bring forward sites and b) it considers Gypsy and Traveller needs are not a	Disagree. The council's Housing Strategy 2012-15 summarises Merton's housing needs and how these will be delivered. It clearly states that one of the council's priorities is to "Identify and meet housing and support needs of minority groups". The council has assessed all of the sites in the <i>sites and Policies Plan</i> against PPTS and Merton Core Strategy criteria and will publish this on Merton Council's website.

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			priority need because the group expressing the need is small in number.	
R041/C128	Mayor's office for Policing	DM C1	Alterations to this policy were sought seeking to allow the release of policing facilities where there would be no net loss in the overall service provision. Policy DM C1 b) i. allows the loss in these circumstances it also highlights that there should be no viable demand for other community uses on the site. However associated paragraph 3.8 requires marketing evidence although is specific to D1 Use Class Community Uses. Whilst this would allow for policing facilities which are generally sui generis to be released with process reinvested to meet the objectives of the Estate Strategy, some policing uses in D1 would be subject to this policy. It is therefore suggested that the wording to Policy DM C1 and / or its sub-text highlights that the retention of community facilities will be applied flexibly in agreed programmes where the disposal of assets can ensure the delivery of an improved service. This would ensure the policy does not inhibit the release of community facility sites.	No changes proposed. London Plan policy 3.16 and Merton's Core Planning Strategy policy CS11 infrastructure support the retention of community facilities (D1 uses) The latter policy also supports the redevelopment of the police estate. Within Merton, the police estate varies between very small "police shop" facilities in neighbourhood parades to larger stations at Wimbledon and Mitcham, the largest police station being a +5 storey building at Tooting. The council does not propose adopting a policy position contrary to the London Plan and Merton's Core Planning Strategy to support the loss of specific types of community facilities.
R062/C192	Sport England	DM C1	Sport England supports this alternative option and indoor and outdoor sports facilities should have a specific section within this policy or a separate policy.	Not taken forward. The council considers that the existing policy framework adequately covers sporting scenarios (indoors and outdoors) and having separate policies for each is unnecessary.
R081/C300	Wimbledon Society	DM C1	The protection of the facilities that exist should be paramount. Therefore the wording of Policy (b) SHOULD COME FIRST & BE STRENGTHENED. The Policy should start from the position that existing facilities should be retained, and any loss would be unusual and governed by strict criteria – see the wording at the end of para 3.4 of the justification. As currently written, the retention of existing facilities is inadequately protected.	Not taken forward. Merton's Core Planning Strategy policy CS11 Infrastructure states that community facilities should be retained, also supported by the London Plan policy 3.16. No need for duplication.
R022/C058	English Heritage	DM C1	We raised concern in respect that Policy DM C1 Community facilities, did not appear to allow that other factors might mitigate against the suitability of the proposal and it may be appropriate that such development occurs in a different location. This remains the case and we would recommend that paragraph 3.5 (page 64) include a sentence to the effect that the Design and siting of all community facilities affecting designated heritage assets will be in accordance with the heritage policies within the document.	No change proposed - the plan should be read as a whole. Design and heritage policies would apply to all development
R022/C059	English Heritage	DM C1	We raised concern in respect that Policy DM C1 Community facilities, did not appear to allow that other factors might mitigate against the suitability of the proposal and it may be appropriate that such development occurs in a different location. This remains the case and we would recommend that paragraph 3.5 (page 64) include a sentence to the effect that the <i>Design and siting of all community facilities affecting designated heritage assets will be in accordance with the policies within this document.</i>	No change proposed - the plan should be read as a whole. Design and heritage policies apply to all development
R081/C462	Wimbledon Society	DM C1	An additional Policy is needed to meet the past undertakings by the Council 6 for a replacement of the Civic Hall in Wimbledon Town Centre, being: ADD DMC1(c): "THE COUNCIL IS COMMITTED TO PROMOTING THE PROVISION OF A MAJOR PUBLIC HALL IN WIMBLEDON TOWN CENTRE". See also the comments on Site 01, the Hartfield Road car park, page 333.	Not taken forward. The council is not currently or seeking to provide a new public hall in Wimbledon town centre, in addition to the existing two theatres
R081/C463	Wimbledon Society	DM C1	An additional Policy is required to reflect the emergence of the Wimbledon Way project, and its proposals for the eastern end of the Broadway. This would widen the current Town Centre offer, and encourage a range of new activities.	No change proposed. A1.7/Transport proposal – Wimbledon Way – Signed route to Wimbledon Village along existing routes. – It is not necessary or possible to name each marked pedestrian route in the Local Plan.
R049/C159	Natural England	DM C1	The Council may wish to make reference to Open/green Spaces under this section as community facilities also; this can then be linked to other Chapters of the document such as Chapter 5 – Natural Environment. This will strengthen the document overall by linking policies and promoting sustainable development across the Borough.	Not taken forward - considered unnecessary duplication. Plan should be read as a whole.
R083/C366	Merton Priory Homes	DM C2	DM C2 Education for children and young people MPH acknowledges the importance of ensuring that the educational needs of children are properly catered for where larger strategic developments are proposed that result in a substantial net increase in the need for school places.	Noted
R081/C301	Wimbledon Society	DM C2	For over 5's (policies (a) – (d)), the current shortage of school places emphasises the need for a clear and publicly available plan for provision of places. The reference to annual monitoring in para 3.14 of the justification is welcomed, but the need for planning for future provision should be reflected in the Policy. This might be achieved by the addition of a new (first) policy item providing for an overall plan, with details for each age group, or by an addition at the end of item (d).	Agree with principle of comment. The council has published several documents setting out the approach to planning for school places, including two studies on provision of primary and secondary school places. The council has published a report on school places strategy for the Schools Task Group and will take this report to Cabinet in November 2013
R089/C454	Internal	DM C2	For the avoidance of confusion, retain the erroneous paragraph reference number 'e)' in this policy.	This numbering error should only be corrected for the 'adoption' version of

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
				the document.
<b>R055/C180</b>	RESIDENTS' ASSOCIATION OF WEST WIMBLEDON	DM C2	New policy proposal para 3.22. The insertion of this new paragraph appears as part of the justification for POLICY DM C2 which seeks to ensure sufficient choice of school places as the borough expands. Wholly contrary to Merton's Open Space Policies, it implies that an open space should be legally secured for one school alone, to the exclusion of the needs of all other educational bodies, academies, schools and members of the public, regardless of the growth of such needs. This paragraph appears to have no place in this document. WITHDRAW PARAGRAPH 3.22	Agreed with principles of removing this paragraph due to the confusion and concern it has caused. The approach set out in this paragraph is aimed at ensuring that everyone is clear about any planning conditions that have deemed it necessary and acceptable for one party to have sole access over open space. The Education Act 2010 allows council-run schools to convert to academies with no requirement for council consent, giving rise to an associated change in land ownership and management. There are now also other forms of state-funded education such as Free Schools, which exist outside council ownership or management. The Localism Act 2011 give other parties (e.g. Friends groups, former council officers, local residents etc) the Community Right to Challenge to take over the management of council services (e.g. planning policy, libraries, parks etc). A planning decision may deem it necessary for a school to have sole access over part of an open space (with all the hours, extent etc set as part of the planning condition) and the aim of this paragraph was to ensure that there was wider clarity (via a legal agreement) as to who would be responsible for what (e.g maintenance, access etc) in the event that either the council-run park changed management or the council-run school changed ownership or management. In following up these responses to Stage 4, residents and local community reps have highlighted current scenarios that they feel that this provision is designed to apply to. As the paragraph is not designed to directly relate to an existing scenario, is not fundamental to the <i>Sites and Policies Plan's delivery</i> , and is designed to introduce clarity rather than cause confusion and anxiety, it is recommended for removal
<b>R022/C060</b>	English Heritage	DM C2	Policy DMC2 Education, we are please to note the inclusion of paragraph 3.23 in respect of historic school buildings.	Noted with thanks
<b>R081/C464</b>	Wimbledon Society	DM C2	Day Care for under 5's should have its own policy, utilizing (f) – (h).	Agreed - this is already in DM C2. Amendment to correct drafting error: criterion (e.) stated <i>Children's Day Care Centres (0-4)</i> . It is now a heading.
<b>R081/C465</b>	Wimbledon Society	DM C2	Para 3.22 (page 68) refers to schools having sole use of parts of open spaces, yet does not relate to or derive from any stated policy. Exclusion of the public from a public open space is a major issue and goes against policy DMO1, and therefore should not be accepted. DELETE: Para 3.22 therefore should be omitted.	Agreed with principles of removing this paragraph due to the confusion and concern it has caused. The approach set out in this paragraph is aimed at ensuring that everyone is clear about any planning conditions that have deemed it necessary and acceptable for one party to have sole access over open space. The Education Act 2010 allows council-run schools to convert to academies with no requirement for council consent, giving rise to an associated change in land ownership and management. There are now also other forms of state-funded education such as Free Schools, which exist outside council ownership or management. The Localism Act 2011 give other parties (e.g. Friends groups, former council officers, local residents etc) the Community Right to Challenge to take over the management of council services (e.g. planning policy, libraries, parks etc). A planning decision may deem it necessary for a school to have sole access over part of an open space (with all the hours, extent etc set as part of the planning condition) and the aim of this paragraph was to ensure that there was wider clarity (via a legal agreement) as to who would be responsible for what (e.g maintenance, access etc) in the event that either the council-run park changed management or the council-run school changed ownership or management. In following up these responses to Stage 4, residents and local community reps have highlighted current scenarios that they feel that this provision is designed to apply to. As the paragraph is not designed to affect any existing scenarios, is not fundamental to the <i>Sites and Policies Plan's delivery</i> , and was an attempt to introduce clarity rather than cause confusion and anxiety, it is recommended for removal.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R003/C011	Barnes J	DM C2 (para 3.22)	<p>"Where it is deemed necessary and acceptable for a school to have shared use of a nearby open space, with the school having sole access to an area during school hours, an appropriately worded legal agreement should be put in place to ensure continued access in the event of the ownership or management of the school or open space changes from that of the council".</p> <ul style="list-style-type: none"> <li>• Could you please explain what this policy is aimed at. If it is a specific site it is inappropriate to include it in a policy document that applies to the whole borough.</li> <li>• The policy only applies to areas currently with council management or ownership so the council would have the ability to make the necessary requirements for ongoing use if and when any change happens, consistent with planning guidance in force at the time. Apart from other considerations the new proposed policy therefore seems unnecessary.</li> <li>• This new proposed policy would prevent public access to areas in a public park or other open space and thus would not be consistent with policy DM01.</li> </ul> <p>This late addition to the document should be removed. If this policy is not removed could you please add my name to the list of people wishing to speak at the inspectors hearing.</p>	<p>Agreed with principles of removing this paragraph due to the confusion and concern it has caused. The approach set out in this paragraph is aimed at ensuring that everyone is clear about any planning conditions that have deemed it necessary and acceptable for one party to have sole access over open space. The Education Act 2010 allows council-run schools to convert to academies with no requirement for council consent, giving rise to an associated change in land ownership and management. There are now also other forms of state-funded education such as Free Schools, which exist outside council ownership or management. The Localism Act 2011 give other parties (e.g. Friends groups, former council officers, local residents etc) the Community Right to Challenge to take over the management of council services (e.g. planning policy, libraries, parks etc). A planning decision may deem it necessary for a school to have sole access over part of an open space (with all the hours, extent etc set as part of the planning condition) and the aim of this paragraph was to ensure that there was wider clarity (via a legal agreement) as to who would be responsible for what (e.g. maintenance, access etc) in the event that either the council-run park changed management or the council-run school changed ownership or management. In following up these responses to Stage 4, residents and local community reps have highlighted current scenarios that they feel that this provision is designed to apply to. As the paragraph is not designed to directly relate to an existing scenario, is not fundamental to the <i>Sites and Policies Plan's delivery</i>, and is designed to introduce clarity rather than cause confusion and anxiety, it is recommended for removal</p>
R060/C189	Smith N	DM C2 (para 3.22)	<p>"Where it is deemed necessary and acceptable for a school to have shared use of a nearby open space, with the school having sole access to an area during school hours, an appropriately worded legal agreement should be put in place to ensure continued access in the event of the ownership or management of the school or open space changes from that of the council".</p> <ul style="list-style-type: none"> <li>• I do not understand why a specific site seems to be singled out in a Planning Policy document. If this is to be applied to all public spaces it seems heavy handed and insensitive.</li> <li>• The policy referred to above, only applies to areas currently within council management or ownership. If this is the case. The Council has the ability to make any requirements they deem necessary for on-going use if and when any change happens, consistent with planning guidance in force at the time. They do not need to set up an overarching policy to delivery this intent. This new proposed policy therefore seems unnecessary.</li> <li>• This new proposed policy would also prevent public access to areas in a public park or other open space and thus would not be consistent with policy DM01.</li> </ul> <p>I believe this late addition to the document should be removed. If you do not remove this policy could you please add my name to the list of people wishing to speak at the inspectors hearing.</p>	<p>Agreed with principles of removing this paragraph due to the confusion and concern it has caused. The approach set out in this paragraph is aimed at ensuring that everyone is clear about any planning conditions that have deemed it necessary and acceptable for one party to have sole access over open space. The Education Act 2010 allows council-run schools to convert to academies with no requirement for council consent, giving rise to an associated change in land ownership and management. There are now also other forms of state-funded education such as Free Schools, which exist outside council ownership or management. The Localism Act 2011 give other parties (e.g. Friends groups, former council officers, local residents etc) the Community Right to Challenge to take over the management of council services (e.g. planning policy, libraries, parks etc). A planning decision may deem it necessary for a school to have sole access over part of an open space (with all the hours, extent etc set as part of the planning condition) and the aim of this paragraph was to ensure that there was wider clarity (via a legal agreement) as to who would be responsible for what (e.g. maintenance, access etc) in the event that either the council-run park changed management or the council-run school changed ownership or management. In following up these responses to Stage 4, residents and local community reps have highlighted current scenarios that they feel that this provision is designed to apply to. As the paragraph is not designed to affect any existing scenarios, is not fundamental to the <i>Sites and Policies Plan's delivery</i>, and was an attempt to introduce clarity rather than cause confusion and anxiety, it is recommended for removal. this paragraph is aimed at ensuring that everyone is clear about any planning conditions that have deemed it necessary and acceptable for one party to have sole access over open space. The Education Act 2010 allows council-run schools to convert to academies with no requirement for council consent, giving rise to an associated change</p>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
				in land ownership and management. There are now also other forms of state-funded education such as Free Schools, which exist outside council ownership or management. The Localism Act 2011 give other parties (e.g. Friends groups, former council officers, local residents etc) the Community Right to Challenge to take over the management of council services (e.g. planning policy, libraries, parks etc). A planning decision may deem it necessary for a school to have sole access over part of an open space (with all the hours, extent etc set as part of the planning condition) and the aim of this paragraph was to ensure that there was wider clarity (via a legal agreement) as to who would be responsible for what (e.g maintenance, access etc) in the event that either the council-run park changed management or the council-run school changed ownership or management. In following up these responses to Stage 4, residents and local community reps have highlighted current scenarios that they feel that this provision is designed to apply to. As the paragraph is not designed to affect any existing scenarios, is not fundamental to the <i>Sites and Policies Plan's delivery, and was an attempt to introduce clarity rather than cause confusion and anxiety, it is recommended for removal.</i>
R020/C055	Edwards T	DM C2 (para 3.22)	It is evident that education is undergoing a number of changes with local authority controlled schools, free schools and academies offering education to a diverse range of interests. The common denominator is that all pupils of these diverse schools are being educated in the borough and the welfare of all children must be a paramount aim of the Council, and of the UK. Policies must therefore offer some flexibility of provision for a diverse range of schools, as existing or as may develop in the future.	Noted.
R020/C056	Edwards T	DM C2 (para 3.22)	<p>The policy is flawed as presented:</p> <p>1) The Localism Act gives communities the right to challenge Councils on the management of council assets. The Council policy appears to ensure that no changes can be contemplated on open space uses and a school has rights which are placed above any other interests within a community. This appears contrary to the provisions of the Localism Act.</p> <p>2) There is no indication of what an "appropriate legal agreement" will be in ensuring access. This might be for 9 years or 99 years.</p> <p>3) What are school hours , between 9 and 3.30? Are Saturday matches held during school hours? The wording lacks precision in its definition of hours and duration of legal agreements.</p> <p>4) If a school makes poor use of a nearby open space why should it continue to enjoy sole access, potentially to the detriment of the space itself, to detriment of other schools and to the use of the space by the local community.</p> <p>5) If the reason for the insertion of this clause is to seek to provide rights for a school such as the Ursuline in its potential use of playing fields in Morley park , why is there a specific policy being written under the guise of a general policy? It is assumed this is not an intent to deliberately pre-empt any agreement on the establishment of a Community Trust . There is a proposal in discussion for a Community Trust to manage Morley Park on which the Ursuline School will be represented as a preferred user. The management of the park and the of sports facilities by the Ursuline does not require such a policy as being promoted.</p> <p>6) The policy lacks flexibility in changing times in education and appears to protect the status quo of existing interests.</p>	Agreed with principles of removing this paragraph due to the confusion and concern it has caused. The approach set out in this paragraph is aimed at ensuring that everyone is clear about any planning conditions that have deemed it necessary and acceptable for one party to have sole access over open space. The Education Act 2010 allows council-run schools to convert to academies with no requirement for council consent, giving rise to an associated change in land ownership and management. There are now also other forms of state-funded education such as Free Schools, which exist outside council ownership or management. The Localism Act 2011 give other parties (e.g. Friends groups, former council officers, local residents etc) the Community Right to Challenge to take over the management of council services (e.g. planning policy, libraries, parks etc). A planning decision may deem it necessary for a school to have sole access over part of an open space (with all the hours, extent etc set as part of the planning condition) and the aim of this paragraph was to ensure that there was wider clarity (via a legal agreement) as to who would be responsible for what (e.g maintenance, access etc) in the event that either the council-run park changed management or the council-run school changed ownership or management. In following up these responses to Stage 4, residents and local community reps have highlighted current scenarios that they feel that this provision is designed to apply to. As the paragraph is not designed to directly relate to an existing scenario, is not fundamental to the <i>Sites and Policies Plan's delivery, and is designed to introduce clarity rather than cause confusion and anxiety, it is recommended for removal</i>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R081/C314b	Wimbledon Society	DM E1	DME1b: The PTAL maps that are referred to do not seem to be included. The previous UDP map (2/2003) was described as having unverified PTAL data. An up to date version is therefore needed. The previous rating for Raynes Park (at only PTAL 3, yet having a mainline station and several bus routes) should be checked.	Minor amendment proposed for clarity to paragraph 4.10, which explains what the PTAL maps are used for and how site proposals should use the most up to date PTAL information from Transport for London "Public Transport Accessibility Levels (PTAL) informs geographical area levels access to public transport. As detailed in <b>Figure 26.1: Merton Public Transport Accessibility Levels (PTAL) of Merton's Core Planning Strategy</b> , the higher PTAL levels are concentrated around the town centres and transport interchanges of Wimbledon, Morden, Colliers Wood, Mitcham and Raynes Park. Areas to the south east and south west of the borough have the lowest accessibility levels. <b>Figure 26.1: PTAL Merton Public Transport Accessibility Levels in the Core Planning Strategy is based on information gathered at a point in time. Therefore, the council would encourage applicants to use the Transport for London (TFL) PTAL calculator to inform planning applications.</b>
R081/C314b	Wimbledon Society	DM E1	DME1e(i): This design point is welcomed, but should include a reference to local character, so amend to read:ADD: "All proposals for development should (i) have layout... etc... appropriate to the site, LOCAL DISTINCTIVENESS and its surroundings." Note that similar phrase is already used in the Plan at DMT5 on page 146 when describing the design of the road network.	No change proposed. 'Local distinctiveness' is already covered by the existing criterion '...appropriate to the site and its surroundings'
R081/C314c	Wimbledon Society	DM E1	DME1e(iii): The local amenity of residential property near employment sites also needs to be protected, so suggest amend/add to read: ADD: "All proposals for development should (iii) not adversely affect traffic movement, road safety OR THE AMENITY OF LOCAL RESIDENTS	Agree with principle of change. Propose amendment to DM E1 e(iii) <del>Should</del> <b>not adversely affect traffic movement or road safety or local amenity.</b> Propose deletion of "should" as repeated word. It should also be noted that policies DM D1 Urban design and the public realm and D2 Design considerations in all developments would also form part of any assessment for employment development
R081/C314a	Wimbledon Society	DM E1	Policy aim: Should be amended to read "minimise the need to travel". i.e. OMITTING the reference to "BY CAR", as providing the opportunity for local people to get to their local workplace easily should be the aim, by whatever transport mode is available; congestion on buses and the rail system also needs to be addressed.	Agreed: amendment proposed to policy aim for DM E1 and DM E2 to read "To ensure that there is an adequate supply of suitable sites and premises in locations that <del>optimise</del> <b>maximise</b> opportunities and co-locational advantages for businesses, minimise negative effects on other users and minimise the need to travel <del>by car</del> "
R011/C034	Costco	DM E1	This representation supports the aim of Policy DM E1 to be in accordance with national, regional and local guidance which highlights the benefits of planning for sustainable economic growth; allowing for growth in business and jobs to enable economic recovery whilst being flexible to support an economy fit for the 21st Century. However, Costco objects to criteria a) of Policy DM E2 which states that 'the council will support proposals for the redevelopment of vacant and underused existing employment land and floorspace for employment use (B uses classes)'. Costco also objects to the wording of criteria d) which sets out that proposals relating to employment sites will only be supported that 'provide research and development (B1(b) Use Class), light industrial (B1(c) Use Class), general industrial (B2 Use Class) and storage and distribution (B8 Use Class) in Merton's Strategic Industrial Locations and Locally Significant Industrial Sites'. Warehouse clubs are a new and emerging sector of wholesaling and, in recognition, and in accordance with the National Planning Policy Framework, London Borough of Merton should recognise this emerging sector which is entirely appropriate on employment sites and the council should plan positively accordingly. Warehouse clubs are commonly found on industrial estates/employment sites and are an established and accepted use of employment allocated land. They generate employment, often at greater levels than B1, B2 and B8 uses and have characteristics that make them comparable with other industrial/employment uses. Indeed, Costco has been found to be appropriate for Strategic Industrial Locations, the highest level of employment land protection. Policy DM E1 as currently drafted does not provide any flexibility for appropriate alternative employment generating uses. This is not considered to be consistent with the National Planning Policy Framework which highlights the need for flexibility within policy frameworks to ensure local authorities can respond to changing market circumstances.	Partial amendment proposed. The London Plan's Industrial Land and Transport SPG (2012) states that sui generis use cannot be applied as a general policy position, not least because, by their nature, sui generis uses must be treated on their individual merits. This is stated in the justification of policy DM.E1 in paragraph 4.13. It is proposed to move paragraph 4.13 to below paragraph 4.4 and make minor amendments to reference the police estate <b>In accordance with the Mayor's London Plan, sui generis use cannot be applied as a general policy position on designated employment sites, not least because by their nature, sui generis uses must be treated on their individual merits and considered on a site-by-site basis. <del>the council does not consider that sui generis uses are generally suitable on designated employment sites.</del> Sui generis use is a term given to the uses of land or buildings not falling into any of the use classes identified by the Use Classes Order. These uses include theatres, nightclubs, retail warehouse clubs, amusement arcades, launderettes, petrol filling stations, <del>and</del> motor car showrooms and parts of the police estate. <del>Proposals for sui generis uses will be treated on their own individual merits and on a site-by-site basis.</del></b>

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R041/C129	Mayor's office for Policing	DM E1	Representations to this Policy sought flexibility to allow for policing uses within the sui generis Use Class to be located within employment areas. The sub-text at paragraph 4.13 now highlights that proposals for sui generis will be treated on their own merits and on a site-by-site basis. By way of context, the nature of policing uses that may be sought on employment areas are similar to that carried out on most industrial sites and therefore are ideally suited to such locations, which generally possess appropriate accommodation and easy access to the strategic road network. These would essentially include deployment and patrol base or custody facilities. Whilst falling outside the 'B' class definition, policing uses suited to employment/ industrial land are employment generating and contribute to employment capacity. Generally the policing uses represent no material change from an Employment (B1) or Warehousing (B8) use, they also possess an employment density similar to or in excess of 'B' class uses and can operate from warehouse type industrial buildings. Vehicle movements are also similar and the majority of these facilities do not require continued public access and therefore have no requirement to be located in town centres. Whilst the draft policy position potentially allows the provision of policing facilities on employment sites they will be considered on a case-by-case basis. By not including explicit reference to policing (or emergency series) within the policy text the test remains overly restrictive. For these reasons there should be some flexibility in the wording to allow for policing uses on employment land either within the Policy or it's subtext	Partial amendment proposed. The London Plan's Industrial Land and Transport SPG (2012) states that sui generis use cannot be applied as a general policy position, not least because, by their nature, sui generis uses must be treated on their individual merits. This is stated in the justification of policy DM.E1 in paragraph 4.13. It is proposed to move paragraph 4.13 to below paragraph 4.4 and make minor amendments to reference the police estate <b>"In accordance with the Mayor's London Plan, sui generis use cannot be applied as a general policy position on designated employment sites, not least because by their nature, sui generis uses must be treated on their individual merits and considered on a site-by-site basis. the council does not consider that sui generis uses are generally suitable on designated employment sites. Sui generis use is a term given to the uses of land or buildings not falling into any of the use classes identified by the Use Classes Order. These uses include theatres, nightclubs, retail warehouse clubs, amusement arcades, launderettes, petrol filling stations, and motor car showrooms and parts of the police estate. Proposals for sui generis uses will be treated on their own individual merits and on a site-by-site basis."</b>
R083/C367	Merton Priory Homes	DM E3	DM E3: Protection of scattered employment sites We endorse the Council's policy to ensure there is a diverse mix of size, type, tenure and location of employment facilities, which can support a range of employment opportunities towards creating balanced mixed-use neighbourhoods. We see the creation and sustainment of local employment opportunities in the Borough as key in our aim to enhance the life chances for our residents, particularly for those in poorer parts of the Borough (4.37).	Noted with thanks
R084/C374	Astranta Asset Management	DM E3	Policy DM E3 Protection of Scattered Employment Sites The criteria based approach to determining whether existing scattered employment sites should be re-worded to be more flexible. This is because for sites such as Haslemere Industrial Estate where the LB Wandsworth is seeking to enforce a width restriction preventing lorries from accessing the site, existing industrial uses on the Estate are likely to have to move immediately to new premises which will allow larger vehicles to access the units. Clearly if a width restriction is put in place this will further deter the sale or lease of the building and the building is likely to lie vacant for 30 months, in order to satisfy criterion iii. There is no benefit for the local economy is allowing buildings to lie vacant for 2 1/2 years and as such, Officers should be able to consider potential changes of use on a site by site basis and be able to take into account factors like road width restricts being put in place, which will further hinder the continued use of an industrial estate for that purpose. Therefore Policy DM E3 a) should be amended to state: a) Proposals that result in the loss of scattered employment sites will be resisted except where some or all of these criteria are met.	Not taken forward. The marketing period is based on evidence and is very flexible as we do not require the unit to be vacant before its marketed and we do state in the marketing criteria that this is the marketing time period unless otherwise agreed with the council. Also the Haslemere Industrial Estate is a proposed site allocation in the Sites & Policies Plan - Site Proposal 70: Haslemere Industrial Estate, and its preferred use is Business/ light industrial (B1 or a suitable employment led redevelopment). Upon adoption of the Sites & Policies document, the applicants would need to submit a planning application to deal with issues such as transport and detail. Concerns with these issues will only be considered by the council at this stage.
R083/C368	Merton Priory Homes	DM E4	DM E4: Local employment opportunities As for item E3, we are supportive of initiatives that provide more employment initiatives in the Borough and particularly those that provide opportunities for training and apprenticeships that lead to meaningful and worthwhile long term employment for local residents. MPH looks forward to continuing the existing fruitful relationship with the Local Strategic Partnership in encouraging employment initiatives.	Noted with thanks
R089/C413	Internal	DME1- E4	1) Due to Inspectors recommendations at Camden, change 'maximise' to 'optimise' in relation to residential. 2) Typos, Capital Letters changes to '.' and ',' throughout the document. 3) In Para 4.22's and 4.31 made changes to provide more clarity on the changes to the GDPO.	1) Due to Inspectors recommendations at Camden, change 'maximise' to 'optimise' in relation to residential. 2) Typos, Capital Letters changes to '.' and ',' throughout the document. 3) In Para 4.22's and 4.31 made changes to provide more clarity on the changes to the GDPO.

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R081/C324(a)	Wimbledon Society	DM O1	DMO1 b(iii): ADD: "...the development is for alternative OUTDOOR sports and recreation...". The London Plan specifically says this at para 7.56. Otherwise, open spaces can be lost to indoor sports and recreation buildings. <b>DMO1 d(iv): ADD: "THE DEVELOPMENT IS FOR OUTDOOR SPORTS AND RECREATION".</b>	Not taken forward. The wording in part b is from the NPPF and the phrase: "should not be built on" ensures that proposals for the the erection or expansion of indoor sports facilities on open space would also need to be assessed against the criteria in policy DM O1. For similar reasons it would not be appropriate to include the proposed additional criteria test/limitation proposed as DM O1 d(iv). Paragraph 7.56 in the London Plan relates to policy 7.17 Metropolitan Open Land (MOL). The reference to the London Plan in part a clarifies that this policy would be a material consideration for any development proposals on MOL.
R081/C324b	Wimbledon Society	DM O1	DMO1f: This policy is welcomed: ADD: "...BY REASON OF MASSING, siting, materials or design." This ensures that the bulk of nearby development does not have an adverse effect on the quality of the open space.	Not taken forward. 'Massing is only one of the elements of good design which is described more comprehensively in policy DM D2 (a) 'Design considerations in all developments'. In this sentence, the use of the word 'design' is deemed to be sufficient. It would be more appropriate to insert the word 'height' as follows in the first sentence of paragraph 5.8: "...should be of high quality design, and of a scale, HEIGHT and massing that are appropriate to their setting."
R081/C324c	Wimbledon Society	DM O1	DMO1g: To make clear that any partial loss of Open Spaces is covered by policy; ADD: "ANY LOSS OF PROTECTED OPEN SPACE WILL BE RESISTED UNLESS EQUIVALENT PROVISION IS MADE IN THE LOCAL CATCHMENT". See for example London Plan paragraph 7.56B. 5.3A: In order that the Council's policy is fully understood, the justification at 5.3 should be strengthened, as follows: ADD: "...guidance. THE STRONGEST PROTECTION WILL BE GIVEN TO MOL, WHICH HAS THE SAME LEVEL OF PROTECTION AS THE GREEN BELT. ANY DEVELOPMENT IN MOL SHOULD BE LIMITED TO SMALL SCALE STRUCTURES THAT SUPPORT OUTDOOR OPEN SPACE USES". The addition underpins the Council's basic policy point about protection, and makes clear that open spaces must not be regarded as cheap building sites for non-open space activities. The wording is specifically derived from the London Plan policy 7.17 & para 7.56.	The reference to the London Plan in part a and paragraph 5.3 is sufficient to clarify that policies 7.17 and 7.18 of the London Plan would be a material consideration for any development proposals on MOL and/or open space. The wording in Policy DM O1 ("...existing designated open space should not be built on unless...") is sufficiently clear to indicate that the policy tests would also be applicable for proposals that protrude onto a part of the open space. There is therefore no need to duplicate wording from the London Plan.
R089/C455	Internal	DM O1	For the avoidance of confusion, retain the erroneous paragraph reference number 'c)' in this policy.	This numbering error should only be corrected for the 'adoption' version of the document.
R081/C324d	Wimbledon Society	DM O1	OPEN SPACES: 5.8: As written, this paragraph could allow the incursion of other uses into open spaces, which would be contrary to basic policy. This should be clarified therefore by: ADDING: line 2/3: "Where redevelopment (of pavilions etc) can provide for more than one OPEN SPACE COMPATIBLE use, the..."	Agreed. Insert 'open space compatible' before the word 'use' in the second sentence of paragraph 5.8.
R068/C214	Thames Water	DM O1	Thames Water's Sewage Pumping Station site at Byegrove Road, Colliers Wood is located within Metropolitan Open Land. There is currently no public access to the Thames Water operational Sewage Pumping Station site for health and safety and security reasons. The site incorporates significant built development including a number of sewage pumping station buildings and two sets of large concrete storm tanks and is not appropriate for public access. Thames Water consider that the Pumping Station site should be identified as an existing Major Developed Site (MDS) in the MOL in accordance with paragraph 89 of the National Planning Policy Framework. The London Plan confirms that Green Belt policy applies to MOL. Paragraph C1 of Annex C to PPG2 Green Belts ,1995, clearly identified water and sewage treatment works as being major developed sites. The Thames Water Byegrove Road site measures approximately 1.35 hectares and incorporates significant built development including a number of buildings and two sets of large concrete storm tanks. Proposed Change Designate the Thames Water Sewage Pumping Station site at Byegrove Road, Colliers Wood as an existing Major Developed Site (MDS) in the MOL.	The Council agrees with Thames Water that the land should remain designated as MOL but disagrees with the part proposing that the site be designated as a Major Developed Site (MDS). The last bullet point of paragraph 89 in the NPPF would be a material consideration with any planning application on the subject site but in Annex 3 of the NPPF it is clarified that PPG2 has been replaced by the NPPF and it is evident that the NPPF does not incorporate the concept of 'Major Developed Sites' as described in Annex C of the former PPG2. Neither the NPPF nor the London Plan requires Merton Council to identify MDS's in MOL and Merton has no policies identifying or referring to MDS. Merton will therefore not be showing any MDS's on its Policies Map.
R049/C164	Natural England	DM O1	This policy appears to have been strengthened in line with our previous comments and we therefore welcome the amendments. Natural England broadly supports this policy, but would like to see reference to creation of 'new open/green space' where appropriate, currently policy is passive. The Council should also give consideration to the potential for fragmentation and increasing deficiency of access, which could be offset by new open/green space as well as green chains/links or corridors (which is referenced under paragraphs 5.17 to 5.19), where appropriate.	DM O1(e) actively supports the creation of new open spaces and further guidance is provided in paragraph 5.11. The wording in DM O1(d) in combination with the wording of policy DM O2(a) and Core Strategy Policy CS 13 Part g (2), is sufficient to address the concerns raised regarding potential fragmentation and increasing deficiency

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				of access, particularly when read in combination with Core Strategy Policy CS 13 parts a, b & c.
R049/C165	Natural England	DM O1 - O2	In respect of delivering on the Natural Environment policies the Council may find that use of the existing natural signature of the borough can be used to help deliver this objective. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local distinctiveness. An example of this can be seen in the Wandle Valley Regional Park which has a natural signature of water meadows echoing the meandering course of the river, backed by bands of wet woodlands.	Not taken forward. The Mayor's All London Green Grid supplementary planning guidance document (SPG) forms part of Merton's Development Plan and is a material consideration for planning applications in Merton. This SPG, which is referred to in paragraph 5.16 of policy DM O1, lists the natural signatures for the Wandle Valley and Arcadian Thames, the two Green Grid Areas relevant to Merton, respectively in tables 5.7 and 5.8. There is therefore no need to replicate this information here.
R081/C325b	Wimbledon Society	DM O2	5.29: The use of semi-mature trees is often problematic in urban sites, and the more successful approach is often to use heavy nursery stock. When trees are lost in a development site, replacements are usually of a very much smaller size than those lost. In order to ensure that tree stocks are not depleted when established trees are cut down, there should be a replacement policy to that balances the new and the lost. One way of doing this is by adopting a "Tree Years" measure, in which the age of the older lost trees is matched by the age of the young replacement trees. REVISE 5.29 to read: "WHEN TREES ARE LOST IN A DEVELOPMENT SITE, THE COUNCIL WILL REQUIRE REPLACEMENTS THAT MATCH THE COMBINED AGE OF THOSE TREES THAT ARE LOST; ie A "TREE YEARS" POLICY. WHERE THE APPLICATION SITE IS NOT ABLE TO ACCOMMODATE ALL THE REPLACEMENTS, THE SURPLUS ARE TO BE PLANTED BY THE COUNCIL ON SUITABLE SITES IN THE LOCALITY". It is suggested that the issue of whether semi-mature or heavy nursery stock are used can then be left for decision in individual cases.	Not taken forward. Not every tree species is available at mature or semi-mature size. Tree nurseries can supply semi-mature trees for several species, a few species of which can be acquired at a very large size. However, whilst the immediate visual effect is great at a large size, there is a greater risk of the tree failing to take. Depending on the species required, smaller trees may be more appropriate to plant. The proposed trees policy provides enough flexibility to ensure provision of appropriate replacement trees.
R049/C166	Natural England	DM O2	Policy DM O2 Trees, Hedges and Landscape Features - This policy also appears to have been strengthened in response to previous comments and the amendments are welcomed. Paragraph 5.24 is welcomed in respect of the potential for Habitats Regulation Assessment and Appropriate Assessment, in respect of schemes and or policy documents that may impact upon Wimbledon Common. Paragraph 5.25 refers to the aspirations to improve green infrastructure and provision of green links, chains and corridors, highlighting the benefits to the wider community and the links/reference to the Wandle Valley regional park are welcomed.	Noted with thanks
R081/C325a	Wimbledon Society	DM O2	The policy of protecting and enhancing biodiversity is welcomed. In addition to the green corridors mentioned, there are very significant green zones formed by the rear gardens of residential properties. Such zones provide not only for nature and a diverse range of wildlife, they accept large quantities of rain water, control runoff, replenish ground water stocks, and act as a moderator to temperature etc, as well as creating a significant amenity & play zone. Development into these rear garden spaces should therefore be controlled. It is therefore suggested that there should be an addition to policy (b) as follows: ADD: after DMO2b: " other landscape features of amenity value; AND MAINTAIN A SIGNIFICANT PORTION OF REAR GARDEN SPACE." 5.25: ADD a justification, using the points above. Paragraph 6.32 could be noted.	Not taken forward. No further amendments are required because these matters are adequately addressed in policy DM D2 part a and in Core Strategy policy CS 13 part e.
R018/C051	Dr PJ Hogarth	Rookwood Open Space (W007)	I am writing with concern to the above site reference. At present the site is designated as green corridor/open land. I believe this to be an essential part of the Defra strategy for wildlife and strongly feel that the site should remain designated as such in the current review. It is an important site for local wildlife, and has been protected as such for over 100 years. It must remain so.	The existing green corridor designation is proposed to be retained and the site is now proposed to be designated as open space.
R082/C356	Hogarth P.J	Rookwood Open Space (W007)	I am writing with concern to the above site reference. At present the site is designated as green corridor/open land. I believe this to be an essential part of the Defra strategy for wildlife and strongly feel that the site should remain designated as such in the current review. It is an important site for local wildlife, and has been protected as such for over 100 years. It must remain so.	The existing green corridor designation is proposed to be retained and the site is now proposed to be designated as open space.

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R035/C112	Kaveh D	Rookwood Open Space (W007)	I am writing with regards to the potential development on the above site. I would like to voice my concern and opposition to the potential change of use of this land from a 'green corridor' to any possible building, hard landscaping. This area has served as a lovely shortcut through a green open space which serves as a wildlife haven for local wildlife in this otherwise built up area. I would hate to see the area lost to development and hope you would agree with my and many local residents on this.	The existing green corridor designation is proposed to be retained and the site is now proposed to be designated as open space.
R030/C100	Howell L	Rookwood Open Space (W007)	I strongly support Merton Council's designation of the land at Rookwood Avenue KT3 4LY (W007) as Green Corridor and Open Space, as previously listed in the 2003 UDP. I feel it is very important to the local community and to the diverse wildlife living on and utilising this land to keep this land as a Green Corridor. The surrounding area is very urban and this land provides a peaceful green area both for the wildlife and for the local community.	The existing green corridor designation is proposed to be retained and the site is now proposed to be designated as open space.
R028/C098	Goodson J	Rookwood Open Space (W007)	I would like to be noted that I request this area of land to be kept as Open Space and Green Corridor and not changed. I have lived on the road since 1995 and many residents and members of the public use this as a route to get to the shops and local schools.	The existing green corridor designation is proposed to be retained and the site is now proposed to be designated as open space.
R081/C342	Wimbledon Society	Rookwood Open Space (W007)	This site is already identified as a small open space: it is bounded by the Beverley Brook, which has a public footpath running along its eastern bank. Because of the wildlife interest, principally water-related birds/vegetation etc, the space should be identified as a Site of Local Importance for Nature Conservation in the list on page 160: (see Policy DMO2 on page 87).	Not taken forward. To appropriately evidence the designation of a site as a SINC or to amend an existing SINC boundary, an extended Phase 1 Habitat Survey report needs to be submitted to the panel of experts on the London Wildlife Sites Board. An appropriately qualified ecologist in the council's Green Spaces team assessed the site on 3 December 2012 for its potential to be designated as a SINC or to amend the adjacent 'Beverly Brook in Merton' SINC to include the site but the conclusion at the time was that the site was not of sufficient ecological quality. The site does however warrant inclusion in the green corridor.
R047/C156	Mrs Newman	Rookwood Open Space (W007)	Where does one begin. To say we are disappointed is putting it lightly. We are all appalled by the thought of our field at the end of our cul-de-sac being turned into a car park. We have lived here for thirty years (some of our residents for over fifty) and am proud of this quaint cul-de-sac with a field at the end. Why on earth would anyone spoil it by having a car park goodness knows. Have we not put up with enough with the B & Q site which is still ongoing, that we are now faced with ruining this lovely little road completely. We chose a cul-de-sac because it has a dead-end, because it is quiet, because it is safer for our children to play. Now, it seems all this is going to be taken away. I would plead with you to not let this happen. Please, please leave it as open land, allow some animals species to live, allow wild flowers to grow, allow our trees to have room to thrive and allow us to have SOME pleasant surroundings around us. We already have a monstrosity with B & Q. Please do not allow another.	The existing green corridor designation is proposed to be retained and the site is now proposed to be designated as open space.
R012/C039	Councillor Jeanes M J	Rookwood Open Space (W007)	The land has been open to the public and the path across it from Rookwood to the footbridge has been used continuously for about 40 years.	The existing green corridor designation is proposed to be retained and the site is now proposed to be designated as open space. More details on public rights of way can be found via Merton Council's website <a href="http://www.merton.gov.uk/publicrightsofway">www.merton.gov.uk/publicrightsofway</a>
R012/C038	Councillor Jeanes M J	Rookwood Open Space (W007)	We are writing to formally say that we agree with the London Borough of Merton's designation of the Rookwood Open Space (W007) as both a Green Corridor and as an Open Space in the current consultation.	Noted with Thanks
R081/C302	Wimbledon Society	DM D1	ADD: Additional policy after (b) which also relates to building and spaces: "THE RESPECTING OF LOCAL BUILDING LINES AND GAPS IN STREET ELEVATIONS, WHICH ARE THE PRINCIPAL ELEMENTS IN FORMING THE SCALE AND CHARACTER OF A LOCALITY".	Not taken forward: it is considered that existing criteria are sufficient.
R049/C160	Natural England	DM D1	Natural England welcomes the inclusion of sub clause (h) referring to opportunities for enhancing biodiversity in all amenity spaces — "soft landscaping" and this can be extended to new development proposals in general, where appropriate. Provision of "soft landscaping" also provides 'permeable' surfaces and can be used to link into Chapter 8 — Flooding and Drainage below.	Noted with thanks
R022/C061	English Heritage	DM D1 - D3	The justification paragraphs for DM D1 (Urban design and Public realm), DM D2 (Design considerations in all developments), and DM D3 (Alterations and Extensions) make reference to Core Strategy Policy CS14 setting out the need for development to respect, reinforce and enhance local character. English Heritage considers this would benefit from additional reference to Core Strategy Policy CS14 also setting out the requirements for the consideration of tall buildings and the impact of proposals on heritage assets. This is pertinent to a number of sites proposals and would help signpost this in respect of relevant issues.	Not taken forward. Reference to Core Planning Strategy policy CS14 is included at the start of all of the DM policies. It is our view that repeating specific elements of the cS policies throughout the DM policies is unnecessary; the Development Plan should be read as a whole (this is stated in the introduction) . Specific site proposals have reference to heritage assets and other significant design considerations where this is relevant.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R083/C369	Merton Priory Homes	DM D1 - D6	6. Design We note and endorse the Council's aspiration for high quality design of buildings and places in the borough. We consider this an essential factor in creating sustainable communities for current and future generations.	Noted
R049/C161	Natural England	DM D1 - D7	Natural England broadly supports this policy, especially in respect of the natural environment, biodiversity and natural habitats. The provision of green infrastructure and biodiversity enhancements in development applications is to be welcomed and encouraged, and has the potential to link into and strengthen other council policies. This section still has a presumption in respect of hard landscaping within the public realm, although there is reference under paragraph 6.10.	Noted with thanks
R081/C303	Wimbledon Society	DM D1 - D7	The ordering of this important Chapter would be improved by; (a) putting the present DMD2 FIRST (as was the case in the earlier draft), as this has the principal design parameters spelled out, and (b) having a SEPARATE POLICY FOR BASEMENT WORKS rather than adding it to the Design policy: as can be seen, it is very extensive, and rather dominates the rest of DMD2.	Not taken forward. Chapter re-ordered to place "urban design and the public realm (DM.D1)" first, thus setting the wider context, then followed by "design considerations in all development (DM.D2) which relates to specific sites. DM.D2 (b) on basements can stand as part of DM.D2 <i>Design considerations in all developments</i> or on its own
R022/C062	English Heritage	DM D1, D2,E2	We recommended that Polices DM E2, D1 and D2 would benefit from a reference to the need for adverse effects on the significance of heritage assets to be avoided or minimised. Such a policy is included in policy D2 in respect of basements (DM D2 (b)) but not in Policy DM D2 (a) in respect of design considerations for all developments.	Not taken forward. The part of the policy relating to basements (DM. D2 (b)(ii) is a criterion stating "not harm heritage assets". DM. D2 (a)(i) states developments must "relate positively to... historic context" Core Planning Strategy CS 14 (a) states that we will achieve this [enhance character and sense of place] by "conserving and enhancing Merton's heritage assets..." London Plan (2011) policy 7.8 <i>heritage assets and archaeology</i> also states (criterion C) that "development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate" In our view, the wording in all of these policies is sufficiently positive regarding the protection of heritage assets not to have to re-iterate protection. Regarding E2 - No amendments proposed. Amendments made to design policies instead (to which all developments would reference).
R052/C175	Pizzuto Adrian	DM D2	I recently viewed the planning policy document on the merton council website, i noticed in section 6.19 Lighting, there was no mention of attempts to reduce light pollution by street lights. Are there any plans to reduce the level of wasted light and therefore tax payer money by properly shielding or directing light or any other method so that it falls only where it is needed rather than into the sky, or people's homes?	Noted. The council is currently investing in its street lighting to reduce energy use and light pollution. For planning policy, there are references are made to reducing light pollution in both the policy (DM D2) and section 6.19
R049/C162	Natural England	DM D2	The references to biodiversity and landscaping under paragraphs 6.20 and 6.21 are welcomed.	Noted with thanks
R081/C304	Wimbledon Society	DM D2 (1)	Generally: This should be RE-POSITIONED to be the first of the Design Policies. Consideration should be given to placing the detailed policies from (a)i-ix under separate sub-headings, for example: Urban form & local distinctiveness, Neighbour Protection, Safety & access, Quality of the new work, Construction issues. This would then emphasise that, in planning terms, the design process has to start with the location, then neighbour protection, and only later go to considering the actual building. Too often, applicants start with the building and only later try to "fit it in" to the locality: and neighbouring property interests are often ignored until too late.	Not taken forward. In our view the current order delivers what the representor proposes. The chapter was originally re-ordered to place "urban design and the public realm (DM.D1)" first, thus setting the wider context, then followed by "design considerations in all development (DM.D2) which relates to specific sites.
R081/C305a	Wimbledon Society	DM D2 (2)	DMD2(a) onpage 94 ADD: "THE COUNCIL WISHES TO SUPPORT AND ENCOURAGE INNOVATIVE MODERN DESIGN THAT UNDERSTANDS LOCAL DISTINCTIVENESS, RATHER THAN A PASTICHE APPROACH". Development that superficially harks back to supposedly earlier "styles" should have no place, and contributes little to either present or future generations.  It also fails to realise the potential opportunities that modern technology can bring. This should be the FIRST policy (a), with the present (a) becoming (b).	Not taken forward. The council's view is that the current criteria, for example DM.D2(a) (i) and (ii) allows for flexibility in building styles. This also complements the extensive explanation of high quality urban design and local distinctiveness given as part of the justification for Core Planning Strategy CS.14 (especially paragraphs 22.9 to 22.12)
R081/C305b	Wimbledon Society	DM D2 (3)	DMD2(ix) ADD: "Ensure that trees and other landscape features are protected BOTH DURING CONSTRUCTION, AND WHEN DEVELOPMENT IS COMPLETED. ANY REPLACEMENTS SHOULD BE ACHIEVED VIA THE "TREE YEARS" APPROACH". (See comment on 5.29 above). The construction phase, although short in the life of the new building, is often very destructive of trees etc.	Not taken forward. Not every tree species is available at mature or semi-mature size. Tree nurseries can supply semi-mature trees for several species, a few species of which can be acquired at a very large size. However, whilst the immediate visual effect is great at a large size, there is an greater risk of the tree failing to take. Depending on the species required, smaller trees may be more appropriate to plant. The proposed trees provides enough flexibility to ensure provision of appropriate replacement trees.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R081/C307a	Wimbledon Society	DM D2 (4)	DMD2b BASEMENTS: on page 95 There is significant interest in having a policy on Basements, and this new approach in response to earlier consultation is welcomed. The range of Policies set out in DMD2 are rather unbalanced by the Basement addition, and therefore it is suggested that: THE SECTION ON BASEMENTS SHOULD HAVE ITS OWN DMD POLICY.	The council feels that the current approach has benefits in terms of making the plan concise, but does not feel that the plan would be disadvantaged should the element of DM.D2 referring only to basements become a separate policy.
R081/C307b	Wimbledon Society	DM D2 (5)	ADD NEW POLICY at (b)(x) "WHERE PRACTIBLE, BE SET WELL BACK FROM PROPERTY BOUNDARIES". It appears that there is significant disquiet when basement works about the property of neighbours. Whilst the Party Wall Act legislation is then usually utilised, the inherent difficulty of placing "stiff" modern construction under or beside "flexible" foundations of earlier buildings can still cause problems. Achieving some horizontal distance between foundations appears to be one way of lessening this issue.	Not taken forward. No evidence to support this approach which couldn't be covered by legislation relating to Building Control matters or provisions proposed in DM.D2, paragraph 6.28 such as a Construction Method Statement or a Land Stability Investigation.
R081/C307c	Wimbledon Society	DM D2 (6)	ADD NEW POLICY (d): "BASEMENTS CONTAINING HABITABLE ROOMS IN FLOOD PRONE ZONES WILL NOT BE ACCEPTED". See the Council's similar policy DMF1 para 8.16 page 127.	Not taken forward: repetition unnecessary. The justification of DM.D2 (paragraphs 6.33 and 6.34) already refer to DM.F2.
R081/C307d	Wimbledon Society	DM D2 (7)	DMD2 6.15 onwards: on page 96 ADD a paragraph at 6.16: The justification for the preceding Policy (a)v on sunlight and daylight etc (which is welcomed) needs to be clearly spelled out. It should come before the other paragraphs, as it should shape the whole design, and is currently very poorly understood by applicants.	Not taken forward: unclear what this will achieve.
R081/C307e	Wimbledon Society	DM D2 (8)	HEADING: "NEIGHBOUR PROTECTION" 6.16 NEW TEXT: "NEW DEVELOPMENT MUST RESPECT THE DAYLIGHTING, SUNLIGHTING AND PRIVACY OF ADJOINING PROPERTIES INCLUDING GARDENS. DETAILED GUIDANCE WILL BE CONTAINED IN MERTON'S DESIGN SPD". The section on "High Quality Design" at 6.16 then becomes 6.17.	Not taken forward as already addressed in DM D2 (a)(v) which states "Ensure provision of appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy to both proposed and adjoining buildings and gardens"
R081/C307f	Wimbledon Society	DM D2 (9)	DMD2 on page 98 para: 6.30 ADD AT END: " demonstrate that the integrity of the listed OR UNLISTED building will be unaffected". Locally Listed buildings are classed as Heritage Assets, & need basement control.	Not taken forward. Paragraph 6.30 is relating to listed buildings. All buildings with basement proposals are subject to DM D2(b) (ii) which states "not harm heritage assets".
R081/C306b	Wimbledon Society	DM D2 (a) new	DMD2a(xiv) DESIGN on page 94 ADD: "ENSURE THAT THE APPROPRIATE CODE/BREEAM LEVELS ARE ACHIEVED BY INCORPORATING THESE AS INTEGRAL PARTS OF THE OVERALL DESIGN, RATHER THAN AS ADD-ONS". "Designing" a new building, and then adding on to it some supposedly energy-saving gizmos, is losing the opportunity to build in an innovative way.	Agreed. Add text to policy and justification.
R081/C306a	Wimbledon Society	DM D2(a)(x)	DMD2(a)(x) DESIGN on page 94 ADD: "...that landscaping forms an integral part of any new development where appropriate, AND THAT AT LEAST HALF OF THE REAR GARDEN SPACE IS RETAINED UNBUILT". (see for example para 6.32 & comments at DMO2). This would ensure that a significant amount of potentially green land could be maintained, for biodiversity corridors, water husbandry and run off control, amenity when viewed from neighbouring properties, and children's outdoor activities.	Not taken forward. While the council supports any measures householders take that will help to enhance biodiversity, provide playspace, improve runoff and visual impact, permitted development rights mean that householders can manage their rear gardens (e.g. paving the surface) outside the planning process. In addition, requiring half a rear garden to remain inbuilt is arbitrary, inflexible and has not been subject to assessment across the different characteristics of the borough.
R081/C308a	Wimbledon Society	DM D3(1)	DMD3a Alterations & Extensions on page 100 The emphasis of this policy as drafted is on the detailed design of the alteration, where instead it should be to respect firstly the prevailing street forms and local distinctiveness, and then the amenity of adjoining gardens and properties. Only when these design parameters have been understood should the detailed design of the extension be produced.	Not taken forward to avoid repetition. DM.D1 covers urban design and the public realm, DM.D2 covers design considerations in all developments, both of which adequately cover street forms, local distinctiveness and amenity.
R081/C308b	Wimbledon Society	DM D3(2)	Also, it is clear that there are many examples of rear extensions that are of high design quality, respect neighbours etc, but do not adopt the architectural idiom of the host building. The desirability of "keeping in keeping" in such situations needs to be questioned, and in some cases is not of any consequence.	Agreed. Rear extensions and alterations that are not visible from the street do not have to replicate the existing building to be considered of high quality design. High quality design that protects local amenity and complements the appearance of the wider setting can be achieved by using appropriate materials, design and detailing that respects but does not replicate the original building. Suggest amendment to DM D3 (a)(ii) to clarify this point "Respect the form, scale, bulk, proportions <del>and materials</del> of the original building". (DM. D3(a)(iii) already states "Use external materials that will be appropriate to the original building and its surroundings") Suggest amendment to paragraph 6.41 <b>As set out in the policy, rear extensions and alterations that are not visible from the street should be of high quality design which protects local amenity and complements the appearance of the wider setting. The council considers that this can be</b>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
				achieved by using appropriate materials, design and detailing that respects but does not replicate the original building.
R081/C308c	Wimbledon Society	DM D3(3)	The ordering of the Council's policy headings should therefore be amended as follows, to put the important elements first. (a) New subtitle: "LOCAL AREA CONTEXT:" (respect street gaps as set out in (iv), wider setting " (v), roof forms (ix), roof materials " (vii), materials " (v), (b) New Subtitle: "NEIGHBOURLINESS" (or respect for adjoining property):ADD NEW POLICY: "ENSURE PROVISION OF APPROPRIATE LEVELS OF DAYLIGHTING, SUNLIGHT, PRIVACY TO ADJOINING BUILDINGS AND GARDENS". (similar to para 6.18)	Not taken forward. As stated in the Introduction (page 12) Neither the policies in the plan nor the criteria in each policy are in priority order unless otherwise stated.
R081/C308d	Wimbledon Society	DM D3(4)	ADD NEW POLICY: "THE PRESENCE OF TREES ETC SHOULD NOT BE USED TO ACHIEVE PRIVACY, AS THEY ARE BY THEIR NATURE IMPERMANENT".	Not taken forward. Planting, including trees, should not be used and would not be acceptable to be used as a substitute for inadequate levels of privacy, given their impermanence.
R081/C308e	Wimbledon Society	DM D3(5)	A new Policy here is essential to guide applicants. Unless an extension is designed from the outset to respect the legitimate expectations of neighbours on these issues, difficulties and delays and objections will be the result. (noise & disturbance as set out in (vi), dormers as set out in (viii)) (c) New subtitle: "THE PROPOSED STRUCTURE" (Form & bulk of the original as set out in (ii), Detailing as set put in (i))	Not taken forward. Unclear what this would achieve.
R005/C015	Bellamy J	DM D4	(p89)Historic Interest of the Above Area: however the 'formal 'Listing' of the canons landscape (the house itself already being listed) is long overdue. The fine lake, walled garden, lawns, shrubberies, specimen trees and the yew walk surely merit recognition. As in many other respects, the historic landscape of Mitcham is under-valued at present. The gardens contain olive trees - surely these are 'special case' trees as mentioned on Page 89, S. 30? (The lake-overlooked by a listed dovecot-is believed to have originated as a monastic stew pond.) Changes: the western extremity of Lower Green West should continue to be shown as an integral part of Fair Green, not as an irrelevant fragment?	Noted. It should be noted that Canons House is listed, therefore the surrounding area, including the boundaries and open garden, are protected as the setting of a listed building
R005/C014	Bellamy J	DM D4	Heritage Asset: at the same time as the progression of Local Listing for the War Memorial on lower Green West, Council officers considered (by local request) the need to recognise the location in the Mitcham Parish Churchyard of a distinguished 'Cross of Sacrifice ' War Memorial, together with the associated Commonwealth War Graves Commission gravestones. As a result of this action, the- memorial and stones are also recognised for local listing. Again, as a result 6T local pressure, both Figges Marsh and London Road Playing Fields are in the process of being designated as Queen Elizabeth II Playing Fields, and hence as items of heritage conservation.	Yes, the structures in Mitcham Parish Churchyard are progressing towards local listing. Figges Marsh and London Road Playing Fields are being considered for designation as Queen Elizabeth II Playing fields, however this will not make them heritage assets.
R081/C309a	Wimbledon Society	DM D4 (1)	DMD4 MANAGING HERITAGE ASSETS on page 102 As is the case with the Extensions policy above, the sub headings in this policy should be re-ordered: policies for works to an individual building need a different approach from policies that deal with whole areas. It is suggested therefore: the first policy should cover the actual buildings: So items c,d,f: The second should cover Conservation Areas and the Setting: So item b:	Not taken forward. The council has clearly set out what is covered by the term "heritage asset" (para 6.49). To avoid duplication, the policy covers all heritage assets.
R081/C309b	Wimbledon Society	DM D4 (1)	Thirdly a NEW POLICY is needed to cover Archaeology and Scheduled Ancient Monuments: ADD: "WITHIN THE DEFINED ARCHAEOLOGICAL ZONES, PROPOSALS WILL NEED TO DEMONSTRATE THAT A DESK-TOP STUDY HAS BEEN EVALUATED. ARCHAEOLOGICAL CONDITIONS WILL BE APPLIED WHERE ACCESS AND/OR SITE EVALUATION ARE DEEMED NECESSARY" Justification: "The Council considers that archaeological remains are fragile, and should generally be preserved in situ, with new development designed around them: their future exploration and evaluation will then remain possible".	Not taken forward. DM.D4 (b) and (c..) set out the steps that need to be undertaken when undertaking work in relation to heritage assets, including the defined APZs. Paragraph 6.50-6.52 clearly set out the way forward with respect to APZs
R081/C310	Wimbledon Society	DM D4 (2)	Para: 6.49: Which lists Heritage Assets: on page 103 ADD at the end of the list "SCHEDULES OF LISTED AND LOCALLY LISTED BUILDINGS, CONSERVATION AREAS AND SCHEDULED ANCIENT MONUMENTS ARE SET OUT IN THE ACCOMPANYING APPENDIX". It is important that Locally Listed Buildings are also included, as they are clearly Heritage Assets, and specifically covered by Policies.  (The typo "it's" in (b) and (ci) needs correction).	Policy Amendment Not taken forward. DM D4 Paragraph 6.55 states that the details of heritage assets are available on Merton Council's website. Typos corrected

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R081/C311a	Wimbledon Society	DM D5	DMD5 ADVERTISEMENTS on page 106 It should be made clear that the Signage required on individual shopfronts etc (which are very necessary for the identification of premises) are dealt with in DMD7. This policy therefore deals with Advertisements for products/events, which generally do not need to be located in relation to specific businesses.	Agree that document improved by referencing. Propose adding reference to DM.D5 Advertisements and DM.D7 Shopfront design and signage "Links to Core Planning Strategy policy CS.14 Design; <b>for shopfronts, see also policy DM D7 Shopfront design and signage</b> "
R081/C311b	Wimbledon Society	DM D5	DMD5 ADVERTISEMENTS on page 106 Suggest that after the general Policy, "Express consent etc... ." which could now be Policy (a): ADD: Policy (b): "ADVERTISING PANELS SHOULD BE SITED SO AS NOT TO AFFECT THE SETTING OF HISTORIC ASSETS OR VALUED TOWNSCAPE, AND ALLOW THE FREE MOVEMENT OF PEDESTRIANS".	Not taken forward. DM.D5 already states "Express consent will only be granted for advertisements where they do not harm the character of an area, amenity or public safety" adding the proposed policy would duplicate unnecessarily.
R081/C312	Wimbledon Society	DM D6	DMD6 TELECOMMUNICATIONS on page 108 Suggest that after the general policy, which could be policy (a): ADD: policy (b): "EQUIPMENT SHOULD BE SITED SO AS NOT TO AFFECT THE SETTING OF HISTORIC ASSETS OR VALUED TOWNSCAPE OR LANDSCAPE". ADD: policy (c): "EQUIPMENT FITTED TO BUILDINGS SHOULD BE POSITIONED AS UNOBTRUSIVELY AS POSSIBLE, AND NOT SEEN AGAINST THE SKYLINE".	Partially agreed
R081/C313	Wimbledon Society	DM D7	DMD7 SHOPFRONT DESIGN & SIGNAGE on page 109 It is good that the design of the shopfront, the structure that forms the front face of the shop, and the signage on the fascia above, should each have their own policy. A new shopfront will need planning permission, the sign will usually need advertisement consent. Policy (a) already covers the design of the shopfront. The signage needs to have additional policy input, as follows: ADD: after (b)iii: (b) iv: "INTERNAL ILLUMINATION OF THE SHOP FASCIA OR LETTERING WILL NOT BE APPROPRIATE FOR LISTED BUILDINGS AND OTHER HERITAGE ASSETS, NOR IN CONSERVATION AREAS". ADD: after (b) iv: (b) v: "EXTERNAL ILLUMINATION OF THE LETTERING WILL NOT BE APPROPRIATE FOR LISTED BUILDINGS".	Not taken forward. The policy (part b) already sets out criteria to ensure that the design and means of illumination will enhance the street scene. There are ways that shop fronts can be illuminated sensitively in conservation areas and for listed buildings that do this.
R081/C316b	Wimbledon Society	DM EP1	ADD: to Map 7.1: AN ADDITIONAL AREA BASED ON THE WIMBLEDON TOWN CENTRE. As background, see the Commons Energy & Climate Change Committee report of 8/8/2013, which recommended "financial aid to support medium size renewable energy generating systems". Should such financial support become available in some form, as seems likely, then the Council needs to be in a position to put forward proposals for suitable funding.	Agreed. Figure 7.1 updated to be the same as was consulted on at Stage 3 which included the most recent copy of the decentralised energy opportunity areas map. The Wimbledon Town Centre CHP opportunity area was added to Figure 7.1 in stage 3 of the consultation. It was accidentally replaced by an early version of the map for stage 4 of the consultation. This has been corrected by reverting back to the map used in stage 3 of consultation.
R081/C316a	Wimbledon Society	DM EP1	DMEP1 Decentralised Energy Networks on page 111 The encouragement for the setting up of such networks is welcomed, as it could lead to a reduction in fuel importation into the Borough, and potentially deliver more economical energy to developments in town centres. Future development schemes should be expected to demonstrate that their heating and cooling systems are capable of being adapted and connected into a future DE network, if this becomes available. The Council should not only identify suitable areas, it should promote them. Wimbledon, Merton's largest single town centre, with a significant number of big developments both existing & future, & capable of forming into a town-wide energy network scheme, is unaccountably omitted from the map, and should be added. The existing BID status could provide an aid in the setting up of a scheme. ADD: to Policy: "The Council will identify AND PROMOTE areas of greatest opportunity for the development of decentralised energy networks "	Agree with change. Amend policy to read " The council will identify <b>and promote</b> areas of the greatest opportunity for the development of decentralised energy networks (see Figure 7.1).
R089/C414	Internal	DM EP2	DM EP2 Reducing and mitigating <del>against</del> noise	Remove unnecessary word
R081/C317	Wimbledon Society	DM EP2	DMEP2 Noise on page 114 ADD: to Policy: " have significant effect on existing and future occupiers AND NEIGHBOURS, or the local amenity ADD: to Policy after (iv): (v) THAT NOISE FROM THE CONSTRUCTION PROCESS DURING DEVELOPMENT IS CONTROLLED". ADD: to para 7.14: " examples of noise-sensitive land uses are hospitals, housing, schools AND OPEN SPACES". As an example, the wide area of the Common is susceptible to significant traffic noise, principally from the A3, which is partly in the RB of Kingston, but skirts the Borough boundary.	add to justification para 7.12 - ' <b>Noise from construction during building of developments will be managed through use of planning conditions.</b>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R081/C318	Wimbledon Society	DM EP3	DMEP3 Allowable Solutions on page 117 The Society is unable to comment on the merits or otherwise of this type of scheme at this time. There appears to be a danger that, by making suitable payments, new developments could be able to avoid meeting Code/BREEAM targets.	Noted
R085/C403	LoveWimbledon (Stage 2)	DM EP3	Para 7.22 amend ", an essential part of every home" to "essential energy uses within buildings".	Para 7.22 amend ", an essential part of every home" to " <i>essential energy uses within buildings</i> ".
R085/C404	LoveWimbledon (Stage 2)	DM EP3	Para 7.22. <del>From 2016</del> <b>In the future</b> , new developments will be required to reduce 100% of regulated emissions (for example, electricity/gas used in heating, cooking and lighting, <del>an essential part of every home</del> <b>essential energy uses within buildings</b> ). There will be three ways in which developments can reduce emissions:	Agreed. Para 7.22. <del>From 2016</del> <b>In the future</b> , new developments will be required to reduce 100% of regulated emissions (for example, electricity/gas used in heating, cooking and lighting, <del>an essential part of every home</del> <b>essential energy uses within buildings</b> ).
R081/C319	Wimbledon Society	DM EP4	DMEP4 Pollutants on page 119 ADD: to Para 7.30: "... Therefore development that may result in an adverse impact to local air quality, INCLUDING DURING CONSTRUCTION, may require...."	Agreed amendment to Para 7.30: "... Therefore development that may result in an adverse impact to local air quality, <b>including during construction</b> , may require...."
R083/C370	Merton Priory Homes	EP1-EP4	7. Environmental Protection MPH is supportive in principle of decentralised energy systems. However, any new developments can only be attached to the decentralised energy networks if there is surety that the well known issues with combined heat and power systems have been resolved. Issues include design and infrastructure to support the systems; monitoring, metering and billing issues; support for securing low tariffs; support for ensuring the maintenance costs associated with the systems are reasonable. MPH would like to see the Council's proposals recognising that the decentralised energy networks can only be utilised once the infrastructure and support for energy supply meets standards that benefit all householders. MPH will always want to install a system which balances low carbon with affordability and ease of use.	Noted. The council does not propose to enforce decentralised energy regardless of quality; rather it wishes to support the development of high quality CHP networks that deliver both environmental and economic benefits to the development which they serve. Issues of quality and feasibility should be picked up during development and design stages. The purpose of this policy is to ensure that decentralised energy are carefully considered during the design rather than making them a mandatory part of the design.
R023/C069	Environment Agency	DM F1	Although we supported the comments inserted on page 124 in regard to Policy DM F1 in our previous representation, the comments have been inserted in the wrong column which may cause some confusion because it would appear to suggest that 'More Vulnerable' development can be permitted in Flood Zone 3b if it supports London Borough of Merton's wider objectives and can be shown to result in an overall reduction in flood risk. Whilst this may be appropriate in largely developed areas like Merton, there has been no precedent for this approach elsewhere and it's contrary to the National Planning Policy Framework, which restricts Flood Zone 3b to Essential Infrastructure/Water Compatible development only. To avoid any confusion and setting a precedent for development within the functional floodplain, the comments would only fit on Flood Zone 3a column not Flood Zone 3b column which is the functional flood plain.	LBM has written to the EA for clarity on this response as it contradicts stage 3 comments
R081/C320	Wimbledon Society	DM F1	DMF1 Flooding & Drainage on page 122 The proposed Policies permit development where flooding is expected to happen, and this is regarded as unacceptable. It does not seem sensible that vulnerable development should be built in any areas that are liable to a flooding risk, and THE POLICIES SHOULD BE RADICALLY CHANGED TO REFLECT THIS. Additionally, there should be an additional policy for the protection of existing vulnerable uses, particularly housing, that now lie in flood-prone zones. ADD: after (a)v: (a)vi: (The Council will ) "SUPPORT ALLEVIATION MEASURES THAT WILL REDUCE THE RISK OF FLOODING TO EXISTING VULNERABLE USES, PARTICULARLY HOUSING". ADD: after (a) vi: (a)vii: (The Council will ) "NOT ACCEPT BASEMENT SCHEMES WHICH INCLUDE HABITABLE ROOMS". (This follows the wording in para 8.16)	Not taken forward. Merton's Core Planning Strategy policy CS16 Flood Risk Management states "We will (a) work with the Environment Agency, landowners and developers based on findings of the most recent Strategic Flood Risk Assessment and other plans to manage and reduce flood risk from all sources of flooding" This would include alleviation measures to existing properties. The table in policy DM.F1 already mentions specifically how basement developments should be managed in flood risk zones 2,3a and 3b.
R068/C209	Thames Water	DM F1	Paragraphs 8.11, 8.15 and 8.16: Support for flood risk management - Support Thames Water support the new references to sewer flooding and basements at paragraphs 8.11, 8.15 and 8.16.	Noted with thanks.
R068/C210	Thames Water	DM F1	Thames Water also support Policy DM F1 where it ensures that developments consider all sources of flooding, including from sewers as pluvial flooding is particularly significant in urban areas.	Noted with thanks.
R023/C068	Environment Agency	DM F1	We welcome policy DMF1-support for Flood Risk Management and are pleased to note that our comment from the previous consultation: that all development proposals must have regard to Strategic Flood Risk Assessment (SFRA) and the Local Flood Risk Management Strategy (LFRMS) has been incorporated.	Noted with thanks.
R068/C211	Thames Water	DM F2	: Sustainable drainage systems (SuDS) and; Wastewater and Water Infrastructure - Support Thames Water support the changes to Policy DM F2 further to their earlier representations and in particular Thames Water support the inclusion of parts viii) and ix) relating to water supply and sewerage infrastructure. Thames Water also wholly	Noted with thanks.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			support Policy DM F2 part vi).	
R068/C212	Thames Water	DM F2	Thames Water also support the changes to supporting paragraphs 8.34 and 8.35 relating to water supply and sewerage infrastructure.	Noted with thanks.
R068/C213	Thames Water	DM F2	Thames Water support the reference to Merton Council supporting the Thames Tunnel project at paragraph 8.38.	Noted with thanks.
R022/C063	English Heritage	DM F2	We are pleased to note that reference to the need for drainage solutions to be appropriate and/or designed appropriately for their context has been included.	Noted with thanks.
R049/C163	Natural England	DM F2	Natural England welcomes and encourages the use of SuDS where appropriate, as part of Green Infrastructure, Ecology/Biodiversity opportunities, where appropriate. The reference to permeable surfaces and use of native planting can deliver this policy, whilst linking into other chapters/sections, helping to strengthen the document further.	Noted with thanks.
R050/C169	Nicholson JD	04 TN	Site and Location: Delete "Chelsea - Hackney Line" and insert "Crossrail 2 Wimbledon to Tottenham Hale". Proposed use: delete "using District Line Track (on route of District Line) to Parsons Green"	Agreed Transport for London recently undertook a major public consultation to obtain people's views towards two alternative route options, a metro-style. High frequency underground option and a regional option with strong connections to the south western main line routes and the north-east, both options would link to Wimbledon Station. The consultation is now complete and TfL/Network Rail will be compiling the results over the coming weeks. However early feedback suggests strong support for the regional option. The chosen route will form the basis of a new safeguarding consultation in 2014. The council have been advised by TfL that the existing safeguarding must be retained until new route alignments are become available. However, understanding may be helped by minor text changes - page 149, 04TN change site and Location to " <b>Crossrail 2 (formerly Chelsea Hackney Line). Change Proposed use.....and access improvements. "Proposal being reviewed by TfL and Network Rail. New safeguarding expected 2014 include significant alignment changes"</b> ". 05TN Proposed use revise text as follows "Former <b>Safeguarding of land for Chelsea Hackney line. Due to be replaced by Crossrail 2 via new safeguarding in 2014, likely to be subject to major change</b> ". Modify all legend pages to include " <b>also links to Crossrail 2 policies</b> ".
R040/C124	Mallon M	04 TN	Why is the District Line between Wimbledon and Southfields stations still indicated as being allocated for Crossrail 2? My understanding was that it will go from Wimbledon Station to Tooting via tunnels now if developed?	Noted. Transport for London recently undertook a major public consultation to obtain people's views towards two alternative route options for Crossrail2, a metro-style. High frequency underground option and a regional option with strong connections to the south western main line routes and the north-east, both options would link to Wimbledon Station. The consultation is now complete and TfL/Network Rail will be compiling the results over the coming weeks. The chosen route will form the basis of a new safeguarding consultation in 2014. The council have been advised that the existing 2008 safeguarding must be retained until new route alignments are become available.
R050/C170	Nicholson JD	05 TN	Site and Location: delete "adjoining District Line". Proposed use: delete " Chelsea - Hackney Line". Ps: Chelsea - Hackney proposal has been abandoned.	Agreed. Amendments as per response R050/C169 to state <b>Crossrail 2 (formerly Chelsea-Hackney Line)</b>
R066/C205	Sutton Council	06 TN	The London Borough of Sutton is extremely pleased to see that the proposed Tramlink routes within your borough have been safeguarded on the Draft Policies Map (Draft Policy 06TN). As you are aware, the London Borough of Sutton is very keen for two extensions to be constructed: Sutton→Rosehill→Morden→Wimbledon; and Sutton→Rosehill→Mitcham Junction→(Croydon). We have already safeguarded these routes within our planning framework and it is heartening that our safeguarding and your safeguarding dovetail. We are also grateful for the support that the London Borough of Merton has given the London Borough of Sutton in meetings with Transport for London. However, on a point of consistency, it may be helpful to name the safeguarding consistently. We note: On Page 150 the safeguarding is referred to as "Tram Line Extension" and "Tram Service". On Page 279 the safeguarding is referred to as "Light Rail Policies"	Agree with improvements for clarity Reference to link rail changed to tram - pages 218, 244, 282, 308 and 328 legend delete reference to " <b>Light Rail</b> " replaced with " <b>Tram Extension</b> "

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R081/C294	Wimbledon Society	12 TN	Wimbledon Town Centre Public Realm improvements: ADD: " and pedestrian environment, WITH ADDITIONAL PEDESTRIAN ENTRANCES TO THE ENLARGED STATION, FROM ALEXANDRA AND QUEEN'S ROADS: ENHANCEMENT OF THE WIMBLEDON WAY PEDESTRIAN SPINE ROUTE, WITH SEMI-PEDESTRIANISATION AND THE.....removal of the one way system." This is to make the Station more accessible from the local area, and avoid the need for all passengers to use the single existing entrance to what will become an even more important and busy rail interchange. And to continue the earlier initiatives by the Council and others to the creation of a special pedestrian spine route through the town centre, which is already shown on the Council's street signage maps.	Partially agreed. Transport Proposals A.1.4 Proposal number 12TN – Reference to Improved station access arrangement included as internal station capacity improvements are likely to come forward during lifetime of plan and these could be supported by wider access improvements. Walking improvements such as Wimbledon Way are already covered by the broader Proposed Use description. The exclusion of a particular scheme or aspiration within the description does not preclude additional proposals coming forward. Minor text change 12 TN insert ... <b>pedestrian environment</b> ", <b>improved station access arrangements</b> ". Proposed Atkinson Morley Hospital site shared cycle route added
R066/C206	Sutton Council	15 TN	Finally, the London Borough of Sutton supports Draft Policy 15TN for the creation of a new access road from the Willow Lane Industrial Estate to Carshalton Road. This will reduce transport movements on Goat Road which forms the boundary between Sutton and Merton. Furthermore, it may encourage more industrial vehicles to use the A236 as a route to the A23, thereby reducing traffic passing through the centre of Hackbridge, which is currently undergoing significant public realm improvements.	Noted with thanks. The Council welcomes L B of Sutton's support for the proposal and subject to LIP funding next year will be seeking to undertake a viability study of movement and other delivery wider issues associated with the proposed access road
R081/C295	Wimbledon Society	24 TN	Fully support the proposal for an additional pedestrian/cycle link to Earlsfield Station. Also pages 358 & 361. A1 .7 page 151: Pedestrian/cycle routes: The "Wimbledon Way" should be shown: ADD: 25TN: Wimbledon Town Centre and Village: "NEW WALKING ROUTE 'THE WIMBLEDON WAY' EXTENDING FROM THE POLKA THEATRE TO THE COMMON AND THE ALL ENGLAND TENNIS GROUNDS, VIA THE STATION". This route is already shown on the Council's street signage maps	No change proposed. A1.7/Transport proposal – Wimbledon Way – Signed route to Wimbledon Village – It is not necessary or possible to include every way marked pedestrian route. Scale of route does not merit separate designation.
R005/C016	Bellamy J	DM T1	p132 the text advocates the enhancement for shared use of walking and cycling routes. This appears to ignore the fact that various statutory rights of way in the Borough, (such as Church Path and Cold Blows) are designated Public Footpaths, with a width appropriate to this use, (not Public Bridleways, a higher form of designation incorporating more generous dimension). Moreover, these footpaths are of great antiquity and are cherished as heritage items. To allocate them for cycle traffic (without the detailed study which would have been inherent in applications to raise their designation to that of Public Bridleway) would risk inherent incompatibility between pedestrians and cycle traffic, to the detriment of people on foot. Various incidents in this locality have illustrated an unwillingness by cyclists to show due care for the safety of pedestrians, (Reference also Site Map, 246; Policies: Map Mitcham C3. Any major attempt at widening of such routes would be at the expense of hedgerows and local character The suggestion that a conventional public path carrying pedestrians across Lower Green West should be opened to cyclists would detract from pedestrian safety.	Partially agree. The development of cycle facilities including shared facilities would be subject to a detailed design process, which would review any potential safety or legal impacts that might arise. They would also be subject to a public consultation/legal process where legal advice requires any change to their designation. For clarity propose amendment to Description on <i>Transport proposal 22TN - Borough wide cycle facilities</i> revised to include reference to safety issues also refer to general comment. Add to end of text Colliers Wood and Morden "(subject to safety reviews)."
R027/C087	GLA	DM T1 (a)	23. In Chapter 9, Transport, Policy, point A, the 'Community Plan Infrastructure Levy' is mentioned. It is assumed that this is referring to the Community Infrastructure Levy, however, this should be clarified.	Community <del>Plan</del> Infrastructure Levy,
R049/C167	Natural England	DM T1-T2	Natural England is supportive of sustainable transport options and encourages the links between this Policy and those of provision of green chains/links/corridors (Policies DM 01 and DM 02), together with increasing access to open/green spaces and nature where possible and appropriate (paragraph 9.4).	Agree to strengthen references Page 133 - para 9.4 insert after open space " <b>as well as opening up new accesses to open/green spaces and nature (policies DM 01 and DM02)</b> "
R081/C331	Wimbledon Society	DM T1-T5	Control of traffic behaviour, by speed reduction zones, or sequenced traffic lights etc, appears to be delivering environmental benefits to both centres & housing areas. An additional policy should indicate the Council's support for such measures. ADD NEW POLICY AFTER DMT4: "THE COUNCIL WILL SUPPORT THE INTRODUCTION OF SPEED CONTROL MEASURES, WHERE THIS WILL IMPROVE LOCAL ENVIRONMENTAL QUALITY".	Not taken forward. The council's transport policies promote sustainable choices and objectives. The use of traffic management tools, such as speed control measures can be the appropriate means of achieving movement or environmental objectives in the right circumstances or where identified in the Transport Assessment, consequently the council does not believe there is no need for a dedicated policy to achieve this.
R089/C461	Internal	DM T3 (p140)	Camden - change maximise to optimise in relation to residential	Agree with change. text change para 9.39 - ..... Is recommended to " <b>optimise</b> " delete word " <b>maximise</b> "
R089/C416	Internal	Walking / Cycling Routes	Rename Walking/Cucling Routes back to Green Chains in Glossary	Rename Walking/Cucling Routes back to <b>Green Chains</b> in Glossary - The amendment has been made.
R089/C458	Internal	Walking / Cycling Routes	Rename Walking/Cucling Routes back to Green Chains in Glossary	Rename Walking/Cucling Routes back to <b>Green Chains</b> in Glossary - The amendment has been made.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R055/C183	RESIDENTS' ASSOCIATION OF WEST WIMBLEDON	Walking/Cycle Routes (Green Chains)	<ul style="list-style-type: none"> <li>Green and white dashed line. Legend states Walking/cycling route (previously known as Green Chain). Route marks periphery of Wimbledon Common and Copse Hill Conservation Area as well as some roads. Much of this marked route is inaccessible. REPUBLISH DETAIL.</li> <li>North/South footpath from Lindisfarne Road to Cottenham Park Road. Important walking route to access Raynes Park and St. Matthew's School. Marked on map but footpaths not shown on Legend.</li> </ul>	Comments suggest confusion regard legend description "walking and cycling route (previously known as green chain)" Proposed change to " <b>green chain</b> "
R081/C355	Wimbledon Society	Walking/Cycle Routes (Green Chains)	<p>Walking/Cycle route is shown as a double line with some solid green and white contained within it, and positioned largely around the boundaries of designated MOL. Unclear what the meaning of the line is.</p> <p>It is drawn around publicly accessible spaces, but also around private spaces, where presumably the public would not be generally able to have access:</p> <p>It is also shown aligned along public roads, set away from MOL:</p> <p>It clearly does not define an actual walking/cycle route, so the description in the Key panel may need to be amended.</p> <p>Page 329: ADD: walking/cycle routes north/south through Atkinson Morley, and East West between sites SO45 &amp; AO10: footpath north/south from Cottenham Park Road to Lindisfarne Road:</p>	Agree with minor text change. Add to page 350 issues - ..... improving bus infrastructure " <b>access to public transport</b> ," walking and cycling.
R081/C331	Wimbledon Society		Car parking on Town and Local centres needs to be reconsidered, both in the number of spaces available and the cost of parking. Currently the aim of the Council appears to be the maximizing of income from parking charges, but this needs to be tempered by the need to ensure that businesses in the centres are able to prosper, whilst not promoting car travel where it is not desirable. Anecdotal evidence suggests that short-stay charges are far too high, and are adversely affecting business activities. The current draft Policy DMT3 deals only with car parking within Developments, and which is accessible to the occupants or users of that development. But a very significant amount of local parking is provided on the public highway, and in publicly owned car parks, and planning policy should control these. ADD NEW POLICY AFTER DMT3: "THE COUNCIL WILL REVIEW THE WAY IN WHICH PUBLIC CAR PARKING CHARGES ARE SET, TO ENSURE THAT TOWN & LOCAL CENTRES & PARADES ARE ABLE TO FUNCTION EFFICIENTLY".	Not taken forward. The council's policy approach to parking charges within its car parks and on-street falls outside council strategic planning policy. Inclusion of a new policy is therefore inappropriate in this instance.
R089/C417	Internal	Appendices	A.1.6. 22 TN,p151: Delete "Continued" and add at the end "(subject to safety reviews)"	A.1.6. 22 TN,p151: Delete "Continued" and add at the end " <b>(subject to safety reviews)</b> "
R089/C418	Internal	Appendices	Change the order of D.1 Conservation Areas to match the maps numbering. And add a link to numbers with the Appendices D1.	Change the order of D.1 Conservation Areas to match the maps numbering. And add a link to numbers with the Appendices D1.
R055/C179	RESIDENTS' ASSOCIATION OF WEST WIMBLEDON	Appendices	Christ Church. Copse Hill, NOT 28 CONWAY ROAD, SW20. - CORRECT.	Factual error. Check council's list of statutory buildings
R055/C178	RESIDENTS' ASSOCIATION OF WEST WIMBLEDON	Appendices	SECTION C3. Atkinson Morley Hospital Woodland. ADD. - "AND SINC LAWN".	No change proposed because the the SINC citation name for site Ref. MeBI09 is 'Atkinson Morley's Hospital Woodland' and the site description includes a reference to the lawn ("Enclosed on three sides by woodland is a large rectangular lawn of acid grassland, with bird's-foot (Ornithopus perpusillus)").
R081/C296	Wimbledon Society	Appendices (Archaeological Priority Zones)	It is assumed that the information on pages 363/4 will be amalgamated with the Policies maps. If the black numbering on pages 363/4 relate to archaeological zones, it could be helpful to set those numbers against the list shown at E1 on page 171.	Agreed, the Conservation areas, APZs, Scheduled Ancient Monuments etc (on pages 363-364, 365) will be amalgamated into the Policies Map
R081/C297a	Wimbledon Society	Appendices (Conservation Areas, Historic Parks & Gardens, Listed Buildings)	<p>ADD: The schedule of the Locally Listed Buildings after Schedule D page 170:</p> <p>They are mentioned as a heritage asset (policy DMD4), and therefore should be included in the formal Plan documents for reference: they will of their nature be subject to minor updating, but this is the same with the Statutory List and Conservation Areas.</p> <p>ADD a note that entries on all these schedules are subject to change, eg listing gradings could be re-assessed, items added/subtracted, new areas designated etc.</p>	Not taken forward. Merton's Locally listed building schedule is available on Merton Council's website and is appropriately referenced in the <i>Sites and Policies Plan</i> . Due principally to its length, we are not minded to add this to the <i>Sites and Policies Plan</i> .
R081/C297b	Wimbledon Society	Appendices (Conservation Areas, Historic Parks & Gardens, Listed Buildings)	D3: Christ Church is in Cottenham Park Road not Conway: page 164; D3: Listed Buildings: the correct spelling is Ridgway not Ridgeway (5 entries): p167; Page 169 Drinking Fountain and The White House are in Wimbledon Hill Road SW19 (not "Windmill"); D3: There does not appear to be an entry for the Old Rectory in Church Road, Wimbledon.	Agreed with all factual amendments D3: Christ Church is in <b>Cottenham Park Road</b> not Conway: page 164; D3: Listed Buildings: the correct spelling is <b>Ridgway</b> not Ridgeway (5 entries): p167; Page 169 Drinking Fountain and The White House are in Wimbledon Hill Road SW19 (not "Windmill"); D3: There does not appear to be an entry for the Old Rectory in Church Road, Wimbledon.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R081/C298a	Wimbledon Society	Appendices (Nature Conservation)	C3: page 159: ADD: "...Atkinson Morley Hospital Woodland AND SINC LAWN"	No change proposed. Refer to response R055/C178
R081/C298b	Wimbledon Society	Appendices (Nature Conservation)	C5: page160: Sites of Importance for Nature Conservation: ADD the site W007 (page 158) & public riverside path beside the Beverley Brook at Rookwood Avenue: (see comment below for page 309).	No change proposed. Refer to response R081/C342
R081/C299	Wimbledon Society	Appendices (Open Space)	1) B1 page 152: MOL: Assume that the Royal Wimbledon Golf Club and the playing fields have been included within the "Common" site description: The Common itself is said to be some 267 hectares, rather than the much larger figure quoted. Assumed that the Aorangi Park and AELTC lands have been included in the "Wimbledon Park" entry. Suggest: Clarify/amend the titles, and Make clear that the open spaces which have been designated as MOL, are listed again separately in B4, B5 etc: eg SO45, M001, MO50, MO56, MO77, MO1 04 etc. 2) SO48 page 154: Address is Wimbledon: Omit "Park." 3) PO04 page 157: site changes to Education in 9/13, so Move into Schedule B4.	1) Not taken forward: the map clearly illustrates the extent of MOL whereas local names are not always universally agreed on (either in name or extent) 2) change made 3) No change - 'Educational Open Space' is soft landscaped areas immediately surrounding the school buildings or other sports pitches for the exclusive use of the school.
R054/C177	Raynes Park & West Barnes Residents Association	Appendices (Open Space)	B.5. All Other Open Spaces: 1-3)M001 Morden Hall Park, M047 Cannon Hill Common and M072 Joseph Hood Recreation Ground are MOL, 4) P004 Sun Alliance Sports Ground should be added to B 4.2 Secondary School as Raynes Park High School including Oberon and Fairway SW20, 5) P006 Suggest Former London Electricity Sports Ground (LESSA), 6) Po14 Delete Raynes Park Lawn Tennis Club and insert The residents Pavilion RP&WBRA, 129 Grand Drive SW20, 7) PO22 should read Prince George's playing fields (=is MOL), 8) PO 23 Messines (is MOL), 9) PO36 Playing Fields (former St Cathrine's) (is MOL). I have listed 1,2,3,7,8 and 9 because they are all MOL but do not show up under the main MOL heading. But I assume the areas of each are included in the broad heading under MOL. Hope you follow me. 10) Also amend Pt11-74 Grid C1 P014 The Residents Pavilion Grand Drive (RP&WBRA)	1-3) No change - these sites are designated as both MOL and open space. For the sake of clarity these sites have been listed between brackets next to the larger portion of MOL that they are part of. 4) No change - 'Educational Open Space' is soft landscaped areas immediately surrounding the school buildings or other sports pitches for the exclusive use of the school. 5) No change now - change will be made for adoption version (awaiting forthcoming address database update) 6) change made 7) No change - this site is designated as both MOL and open space. For the sake of clarity this site has been listed between brackets next to the larger portion of MOL that it is part of i.e. Cannon Hill 8) Change made - this site is designated as both MOL and open space. For the sake of clarity this site has been listed between brackets next to the larger portion of MOL that it is part of i.e. Cannon Hill 9) Change made - this site is designated as both MOL and open space. For the sake of clarity this site has been listed between brackets next to the larger portion of MOL that it is part of i.e. Lower Morden 10) P014 change will be made for adoption version (awaiting confirmation of correct name - refer to response R050/C171(a): 'Raynes Park Residents Open Space')
R050/C171a	Nicholson JD	Appendices (Open Space)	B5 All other open space: P005 Malden Golf Course, delete "troops" and insert "traps", P006 delete "London Electricity Sports Ground (LESSA) Grand Drive and insert Raynes Park Lawn Tennis club and open space" "Meadow View Road, SW20" "3.64 (ha). NB Several houses built a LESSA site plus new tennis club open space on opposite site, P014 delete "Raynes Park Lawn Tennis Club" and insert " Raynes Park Residents Open Space""Grand Drive, SW20" NB: Raynes Park Residents association now occupy this site.	P005 change made P006 change will be made for adoption version (awaiting forthcoming address database update) P014 change will be made for adoption version (awaiting confirmation of correct name - refer to response R054/C177: 'The Residents Pavilion Grand Drive')
R089/C459	Internal	Appendix E3 b1	Grammar change to "Providing employment, as part as of a mixed use scheme on-site"	Grammar change to "Providing employment, as part as of a mixed use scheme on-site"
R089/C460	Internal	Appendix F	To include additional information contained in the NPPF guidance which is currently out for public consultation. Included the following text "and guidance (as amended)" after reference to NPPF and "This appendix sets out a summary of what is required for sequential tests and impact assessments. Applicants should ensure that they meet the requirements of the NPPF and guidance (as amended) in full." In part D of F.1 replaced 'we' with 'the council' In F.2 included the words 'trade draw'.	To include additional information contained in the NPPF guidance which is currently out for public consultation. Included the following text "and guidance (as amended)" after reference to NPPF and "This appendix sets out a summary of what is required for sequential tests and impact assessments. Applicants should ensure that they meet the requirements of the NPPF and guidance (as amended) in full." In part D of F.1 replaced 'we' with 'the council' In F.2 included the words 'trade draw'.
R089/C419	Internal	Appendix K	Updated this appendix with more evidence base documents that needed to be included.	Updated Appendix.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R081/C334	Wimbledon Society	Glossary	It would be helpful to include in this glossary: Flood Zone (page 175): Historic Building: Locally Listed Building: PTAL.	Agreed We will update the Glossary
R022/C067	English Heritage	All	Having reviewed the draft submission in light of other councils' approach, such as Camden and Waltham Forest, we consider that there would be considerable benefit in including a paragraph for each site allocation that sets out clearly the design, context, and development opportunities. In line with the NPPF, the Site Allocations DPD provides the opportunity to interpret the Council's Local Plan policies within the context of the issues identified, resulting in a clear set of development parameters that are site specific. For example, Morden, Proposal 24 outlines the need to respect character and views to and from Morden Hall Park but does not clarify the potential scale of development or clarify the local character that needs to be respected in this context. Such an approach would help provide greater certainty for potential development, identify opportunities for the enhancement of local character, and deliver sustainable proposals. Such an approach could also address our previous comments in respect of the need to recognise and respond to the Conservation Area status of grouped sites in Mitcham and the sensitivity of the site next to Wimbledon Theatre. Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the Draft Sites and Policies Plan	Not taken forward. Council considered the costs and benefits of taking a design led approach with respect to the sites allocated in the Sites and Policies Plan. To summarise, the council decided not to include detailed site design requirements for the following reasons: design related matters are best considered once the scale and form of development is known, information which is not available for most sites; development should be considered against policies - specifying design criteria could pre-empt decision making before suitable information and evidence is available; specifying design criteria could unduly restrict some development without sufficient evidence; development is considered to be best determined by development control when interpreting policy; specifying design constraints could become too prescriptive and could limit flexibility on sites which does not accord with the NPPF; Merton is considered a diverse borough with few of the allocated sites exhibiting similar characteristics which would result in a relatively detailed design assessment being required for all sites in the plan, with huge inputs required for larger or more complex sites; it is considered that the council generally has sufficient information with emerging policy, conservation area and borough character studies and other documents to guide development at the time planning permission is sought - this will enable all relevant matters to be considered with a design for an entire site at one time, rather than determining various components at different stages.
R027/C091	GLA	General	26. The fact that a development plan document is inconsistent with one or more policies in the London Plan, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather, the test is how significant the inconsistency is from the point of view of delivery of the London Plan.	Noted. (conformity issue on affordable rent addressed in Housing policies)
R027/C092	GLA	General	27. Any expression of opinion from the Mayor that the Draft Sites and Policies Plan and Draft Policies Map CPU is not in general conformity will be treated as a representation to be dealt with by the Inspector at the examination. The Planning Inspectorate has stated that the view of the Mayor's opinion "will be given considerable weight" and that a lack of general conformity with the London Plan will need to be fully justified on the basis of local circumstances, based on relevant evidence.	Noted. (conformity issue on affordable rent addressed in Housing policies)
R027/C093	GLA	General	29. The Development Management Policies document submission version contains many positive aspects. The document however, remains to be not in general conformity with the London Plan in relation to the Council's position on affordable housing, and specifically the new policy DM.H3, which proposes to cap affordable rent levels at 65% of market rent. Further discussion would be welcomed in relation to this point and those issues raised in respect of student housing, transport and the allocated use for the Wimbledon Greyhound Stadium site in order to bring a document forward that is in line with national guidance and the London Plan.	Noted. Amendment proposed to DM H3 to remove reference affordable rent levels. Further discussion has been undertaken on student housing, allocation of Wimbledon greyhound stadium and transport matters. The council believes that these proposed amendments bring the document into general conformity with the London Plan
R040/C125	Mallon M	General	As a general point if the Council is going to sell land to developers please be a lot more savvy than you were with the Arthur Road development of the local hall into a grotesquely disproportionate building which is entirely unsympathetic to the character of the local area and totally unpopular with people who live in the area except for one individual who calls himself the chairman of Wimbledon Park Residents Association but speaks for no one but himself. Make sure you get overage; make sure you get clawback where development is not commenced within a period of time; make sure you get proper CIL payments; don't be bullied into accepting revised planning applications or reduced s.106 commitments from developers on the basis that their schemes are otherwise not viable – with the way that resi values are going up in Wimbledon they will invariably be lying. Find out the profit on cost that developers actually expect and do deals with them as if you were a private land owner who had obtained the planning (i.e. the developer can take the first x% of profit on costs and shares the rest with you) – those are the type of deals done in the private sector – as custodians of public land don't enter into bad deals – you don't need too.	Noted. No amendments proposed to the Sites & Policies Plan and Proposals Map. This comment is more relevant for the forthcoming Planning Obligations SPD.
R027/C089	GLA	General	As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24(1) (b) of the Planning and Compulsory Purchase Act 2004. However, it is my opinion that the Sites and Policies Plan proposed submission document is not in general conformity with the London Plan in respect to the	Noted. Amendment proposed to DM H3 to remove reference affordable rent levels. Further discussion has been undertaken on student housing, allocation of Wimbledon greyhound stadium and transport matters. The

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			Council's position on affordable housing, and specifically Policy DM.H3 which proposes to cap affordable rent levels at 65% of market rent. Further discussion would be welcomed in relation to this point and the issues raised in respect of student housing, the allocated use of Wimbledon Greyhound Stadium and transport in order to bring a document forward that is in line with national guidance and the London Plan.	council believes that these proposed amendments bring the document into general conformity with the London Plan
R044/C141	Merton Council Director of public health	General	Both the core strategy and these policies show some awareness of the influence of the built environment on health. About 70 -80 percent of what creates health comes from the interaction of factors outside health care services, including education and work/income, as well as the built environment – housing and our high streets, for example. The figure below sets out this relationship, showing that we are born without biology/genetic inheritance and this interacts with our families and communities to influence our lifestyle choices. These are influenced by the opportunities to which we have access during our lives, especially education and work, which in turn are influenced by the wider socio-economic and political environment. It would be good to reference the framework and its relationship to the policies set out in this plan. This plan seems to provide some advance in terms of health on the core strategy, which deals mainly with health care. These development management policies do go further by recognising the importance of the built environment. For example, work, open space, and sustainable transport are seen as adding value in themselves although without reference to their influence on health and well being. The plan makes mention of a requirement to undertake health impact assessment on planning proposals, which would contribute to a better understanding of the relationship between the built environment and health, among other things.	Noted with thanks. Merton's Core Planning Strategy Strategic Objectives 2 and 5 shows the overall strategic objectives of the local plan, particularly with regards to reducing social deprivation and making Merton a healthier and better place for people to live and work in or visit. In each policy section of the Core Planning Strategy the council links the policy to the relevant strategic objective. This exercise will also be completed for Merton's Sites & Policies Plan and Proposals Map.
R081/C333	Wimbledon Society	General	<p>CERTAINTY</p> <p>Another general point concerns the need for certainty about the force of Policies. Some Policies are accompanied by caveats which significantly weaken their basic intention, and this could encourage attempts at evasion. There is a need for all Policies to be reviewed to ensure that they send a clear message to applicants; and do not leave the public in doubt about the protection that Policies provide. 2</p> <p>ASPIRATIONAL PROJECTS</p> <p>Whilst it is understood that this type of Plan is required to concentrate on what can be knowingly achieved, nevertheless there is a case for putting together some kind of "shopping list" of projects that could eventually become part of the Council's future plans. Such a list would stimulate interest and input, and give a pointer to the future, and could help in seeking investment or public funding. As examples, a CHP retrofit scheme for a town centre, acoustic barriers to busy traffic routes, improvements to particular pedestrian and cycle paths, pressing for large retail to be placed in a separate use class from local shops, a replacement Civic Hall/performance space in Wimbledon town centre: the Wimbledon Way pedestrian route project and its associated public realm improvements: there are many more initiatives and worthwhile aims. Whilst none may currently have a specific funding stream currently available, such projects may well be thought of as desirable. The advent of the CIL funding regime should be a stimulus to this approach. Without such an aspirational list to draw on, future opportunities could be missed. If there is a resistance to incorporating this approach, may there be a case for some kind of accompanying document, that could be seen as a menu, to be drawn down as opportunities present themselves?</p>	Not taken forward in the Sites and Policies Plan. Merton's Community Infrastructure Levy project lists (required under CIL Regulations 123) will contain up-to-date infrastructure projects with broad costings attached. The project list will be prepared with community consultation; anyone will be able to submit projects. Local communities will also be able to prepare their own project lists to set out how local CIL or other monies will be spent.
R089/C420	Internal	General	Change " <i>LDF Annual Monitoring Report</i> " to " <b>Authority's Monitoring Report</b> " wherever it occurs	Factual change
R045/C142	Mitcham Cricket Green Community and Heritage Group	General	Mitcham Cricket Green Community and Heritage is the civic society for the Cricket Green Conservation Area and its environs. We have been closely involved in the development of the Conservation Area Appraisal and Management Plan and numerous development proposals in the area. We are also part of the wider civic movement through membership of the national charity Civic Voice. 2.The Sites and Policies DPD is an important document shaping the future development and land use of the area and we welcomed the opportunity to comment on both the potential development sites and the draft proposals map at Stages 2 and 3. We welcome a number of the changes which have subsequently been made and offer some further comments below. As part of this process we have worked with the futureMerton team at Merton Council and with our ward councillors to establish a clearer community aspiration for the Cricket Green neighbourhood and a number of the key development sites and opportunities within it. The results of this work are published in the report of the Tune In Cricket Green community event which was held in March 2013 and the subsequent Cricket Green Charter. These consider a number of the specific development sites as well as	Noted with thanks.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			setting out wider aspirations for the area. We ask that they be considered prior to adopting the final document and copies are enclosed.	
R027/C090	GLA	General	Strategic issues: The Development Management Policies Document is still not in general conformity with the London Plan in relation to its affordable housing policy. The report also raises issues with regards to student housing, transport and the site allocations.	Noted. Amendment proposed to DM H3 to remove reference affordable rent levels. Further discussion has been undertaken on student housing, allocation of Wimbledon greyhound stadium and transport matters. The council believes that these proposed amendments bring the document into general conformity with the London Plan
R081/C332	Wimbledon Society	General	STRUCTURE: There is a need to review the structure of the document so that it better meets the needs of users - both members of the public and practitioners. Some progress has been made in this direction, but more needs to be done to enable those involved in, or affected by, the Council's development management policies to have a simple and clear way into this document, which will be the turn-to document for most users. FORMAT: The final shape of the formal document is not yet clear. The introductory pages (3 - 13) are a mixture of long-term plan material on the one hand, and background information about how the current document has been produced, and the consultation arrangements on the other. Page 3 and the top two paragraphs on page 4 provide the clear statement about the various elements that go to make up the Local Plan, which the Society have requested. Pages 4 and 5 are historical and might form part of a preface before the formal statutory plan is reached. Page 6 is purely transitory. Pages 7 - 8 are a mixture of material which might form part of a preface, and some paragraphs (such as those on the presumption) which might be better linked with the account of what the Local Plan is in pages 3-4. These considerations apply also to pages 12-13, parts of which are, again purely transitory.	Noted. The introduction will be reviewed prior to adoption and any transitory information will be removed.
R022/C066	English Heritage	General	We are please to note that the many of our suggested revisions (please see Claire Craig's letter of 17 August 2012) have been incorporated into the revised document. Where appropriate I have referred to our previous comments and set out any observations arising. In light of the emerging approach by other councils, I have also set out our recommendations which we consider could be beneficially incorporated into the document.	Noted with thanks.
R083/C357	Merton Priory Homes	General	We believe that the latest draft policy is in line with the desire of MPH to achieve high quality, sustainable environments in which households will flourish and where there is greatest potential to enhance the life chances of our residents.	Noted with thanks
R045/C143	Mitcham Cricket Green Community and Heritage Group	General - Locally listed buildings	19. We encourage inclusion of the following in the Local List: Three Kings Pond – noted for the historic carriage ramps; War memorial on Lower Green West	These will be assessed against the Local List criteria
R089/C421	Internal	General - Page 14	Policy aim - change "neighbouring" to "neighbourhood"	Policy aim - change "neighbouring" to "neighbourhood"
R089/C422	Internal	General - Page 19	Para 1.27 refers to Appendix 6 but the appendices are lettered. Amend	Para 1.27 refers to Appendix 6 but the appendices are lettered. Amend
R089/C423	Internal	General - Page 20	Para 1.28 refers to 800m but the figure shows 500m. Amend one.	Para 1.28 refers to 800m but the figure shows 500m. Amend one.
R089/C424	Internal	General - Page 23	Para 1.39 second word correct "In" to "in"	Para 1.39 second word correct "In" to "in"
R027/C094	GLA	Site 01 Hartfield Road car park (P3)	20. TfL still has concerns over the proposal for the above site as the Sir Cyril Black Way Bus Stand is located within its boundary. As per TfL's previous representations, this is a very important asset and must be protected from any potential development if bus services in the area are to be adequately provided for. TfL requires the site proposal be amended to safeguard the bus interchange, unless or until a suitable alternative is identified which results in no overall loss of capacity or operational convenience. Until the policy is amended to include this safeguarding, TTL object to this site allocation which is contrary to London Plan Policy 63 and the Land for Industry and Transport SPG (September 201 2).	No action needed as we have received updated correspondence received from the GLA advised that this comment was made in error as the bus stand referred to has been excluded from the site allocation.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R081/C388	Wimbledon Society	Site 01 Hartfield Road car park (P3)	<p>As written, the open-ended nature of the list of potential uses is somewhat simplistic, and allows for a future developer to select only those that are commercially attractive: The other uses, although listed, may simply never be provided. Accordingly, the Society considers that it should be clearly stated in the Plan that: "THE PRINCIPAL USE SHOULD BE FOR CULTURAL, ARTS, LEISURE AND COMMUNITY: AND ANY OTHER USES SHOULD BE ANCILLARY".</p> <p>Given that the Council is the owner of the site, this can be a clear legal requirement when the time comes for the Council to dispose of the lease. It is also essential for the well-being of the Town Centre that the range of offer is made wider, something that a number of reports and studies over recent years has made very clear. Leaving the choice of uses to short term commercial interests is a recipe for delivering more of what already exists, and would fail to deliver the diversity of the Town Centre offer that is needed. Additionally, this is a site that should be identified as a potential contributor to a Town Centre Combined Heat &amp; Power (CHP) scheme (see comments on policy DMEP1).</p>	<p>Not taken forward. The allocation does not preclude the type of development suggested within the representation. The site allocation provides for a range of uses which enables a degree of flexibility with regard to the future development of the site and the commercial viability of development given various constraints. Flexibility is provided with the allocation as it is situated in Wimbledon town centre. This is consistent with town centre development and policies with the idea of creating a vibrant and viable town centre. It is also consistent with the NPPF to ensure a new development can be delivered on the site in accordance with existing and emerging policy. It is not considered appropriate to allocate the site principally for cultural, arts, leisure and community uses for several reasons. Firstly, the viability of such a development is questionable and no party has approached the council or provided information to suggest that such a scheme would be deliverable, as required by the NPPF. If it was viable, the allocation enables such a development to occur. It is also considered that there is a sufficient amount of existing community space available within Wimbledon town centre. Emerging policy regarding combined heat and power scheme will govern how such services are provided.</p>
R081/C343	Wimbledon Society	Site 01 Hartfield Road car park (P3)	<p>P3 The Hartfield Road Car Park: Site 01: page 334: Allocated Uses:</p> <p>As written, the open-ended nature of the list of potential uses is somewhat simplistic, and allows for a future developer to select only those that are commercially attractive: The other uses, although listed, may simply never be provided.</p> <p>Accordingly, the Society considers that it should be clearly stated in the Plan that: "THE PRINCIPAL USE SHOULD BE FOR CULTURAL, ARTS, LEISURE AND COMMUNITY: AND ANY OTHER USES SHOULD BE ANCILLARY".</p> <p>Given that the Council is the owner of the site, this can be a clear legal requirement when the time comes for the Council to dispose of the lease.</p> <p>It is also essential for the well-being of the Town Centre that the range of offer is made wider, something that a number of reports and studies over recent years has made very clear.</p> <p>Leaving the choice of uses to short term commercial interests is a recipe for delivering more of what already exists, and would fail to deliver the diversity of the Town Centre offer that is needed.</p> <p>Additionally, this is a site that should be identified as a potential contributor to a Town Centre Combined Heat &amp; Power (CHP) scheme (see comments on policy DMEP1).</p>	<p>Not taken forward. The allocation does not preclude the type of development suggested within the representation. The site allocation provides for a range of uses which enables a degree of flexibility with regard to the future development of the site and the commercial viability of development given various constraints. Flexibility is provided with the allocation as it is situated in Wimbledon town centre. This is consistent with town centre development and policies with the idea of creating a vibrant and viable town centre. It is also consistent with the NPPF to ensure a new development can be delivered on the site in accordance with existing and emerging policy. It is not considered appropriate to allocate the site principally for cultural, arts, leisure and community uses for several reasons. Firstly, the viability of such a development is questionable and no party has approached the council or provided information to suggest that such a scheme would be deliverable, as required by the NPPF. If it was viable, the allocation enables such a development to occur. It is also considered that there is a sufficient amount of existing community space available within Wimbledon town centre. Emerging policy regarding combined heat and power scheme will govern how such services are provided.</p>
R041/C133a	Mayor's office for Policing	Site 01 Hartfield Road car park (P3)	<p>The revised list of sites outlined in Part II have been assessed and it is noted that a number of them have the potential to facilitate development on a scale which would potentially have an impact on the policing needs of the area. Many already have a reference to the provision of community facilities on site whilst other sites are no longer listed. The sites which do not include reference to community facilities but are considered to have the potential for development which may impact on the policing needs are outlined below: <b>01 - 'P3' Hartfield Road Car Park</b>, Car Park Site of No. 66-84, Hartfield Road, Wimbledon SW19 3TB <b>17 - Worsfold House / Chapel Orchard</b>, Church Road, Mitcham, CR4 3BE <b>19 - Nelson Hospital (including car park)</b>, 220 Kingston Road, Raynes Park, London SW20 80B</p>	<p>Noted. In line with Merton's planning policies, the potential impact on local infrastructure will be considered as part of a planning application once the scale and form of development is known. It should be noted that the Nelson Hospital site was removed from the plan in early 2012 after planning permission was granted to build a new hospital and sheltered housing on the site (construction has now started). It should also be noted that it is the council's view that proposals for Wimbledon Greyhound Stadium also have the potential to impact on policing needs; anyone with proposals for the site has been advised to contact a named officer in the Met Police at an early stage (pre-application)</p>
R074/C278	Wallace .S	Site 01 Hartfield Road car park (P3)	<p>The Hartfield Road car park should be retained as a car park - it should not be part converted to retail use - quite why you propose further Morison's (sic) expansion is baffling. Improvements could be made to improve the bus interchange adjacent to the car park which has poor and hazardous access for bus users.</p>	<p>Noted. The allocation does not state that the council proposes any expansion of the Morrisons store. This was proposed by the owners of the adjoining Morrisons store. The council has undertaken parking surveys within Wimbledon town centre which confirmed there is surplus parking in the town centre. Accordingly, the council decided to release the site for redevelopment. As stated in the allocation, parking demands on the site generated from any redevelopment will be considered at the time a planning application is sought. Onsite parking may have to be provided</p>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
				onsite as part of any redevelopment; however this will be subject to further investigation and evidence at the time of redevelopment. The bus interchange has been excluded from the site allocation at the request of the GLA and TfL and access would have to be taken into account and improved with the redevelopment of the site.
<b>R081/C387</b>	Wimbledon Society	Site 01 Hartfield Road car park (P3)	The site description should be amended to state that it is council owned, and that the council has control over it as a land owner and planning authority.	Not taken forward. The site owner is not a relevant planning policy consideration with regard to the development of the site.
<b>R041/C133b</b>	Mayor's office for Policing	Site 01 Hartfield Road car park (P3)	The site does not include reference to community facilities but are considered to have the potential for development which may impact on policing needs.	The allocation includes community facilities, which the police estate may choose to occupy if needs are identified. The potential impact on local infrastructure will be considered as part of a planning application once the scale and form of development is known. The council notes that the MPA/MPS Estate strategy does not identify this area for additional needs and that the MPS have (Sept 2013) put the nearby police station and offices at Tabor Grove, Wimbledon up for sale.
<b>R068/C217</b>	Thames Water	Site 01 Hartfield Road car park (P3)	We have concerns regarding potable water services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure." On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: <b>"Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."</b>
<b>R046/C155</b>	Morrissons WM Supermarkets plc	Site 01 Hartfield Road car park (P3)	We write on behalf of our client, Wm Morrison Supermarkets Plc (hereafter referred to as Morrisons), to submit representations on the proposed allocation for 'Site Proposal 01: Hartfield Road Car Park' contained in the Submission Draft Sites and Policies DPD dated July 2013. We commented on the previous draft DPD's by way of letter on 09 March 2012 and email 28 February 2013 and you will note that our clients comments remain unchanged. Morrisons endorses the council's vision that any future redevelopment of the site incorporates retail use. Furthermore, we note that the latest draft allocation confirms that the site will be allocated for "any of the following or an appropriate mix of town centre type uses such as retail (A1 Use Class)..." However, Morrisons respectfully requests that the Hartfield Road Car Park is reserved for the proposed extension to their existing store on the grounds that it represents the only realistic opportunity site to expand their operation and to create a large food superstore that is commensurate with the scale and function of Wimbledon 'Major' town centre in Merton's retail hierarchy. This is supported by draft Policy DM R1. The existing Morrisons store plays a fundamental role anchoring the Crescent Shopping Centre, as well as the convenience offer of the town centre as a whole, by catering for both the main food and day-to-day shopping needs of local residents, workers and visitors. The store experiences a strong trading performance and is prone to overcrowding and congestion. A larger Morrisons store will help to alleviate the prevailing deficiencies and claw back expenditure and shoppers that are currently leaking to edge-of-centre and out-of-centre foodstores and competing centres to a sequentially preferable, highly sustainable and accessible location in Wimbledon's Central Shopping Area. An extended Morrisons store in this location would also generate significant benefits for the town centre through the increased retention of shoppers, linked trips and spin-off expenditure to other shops, businesses and facilities to help enhance the centre's overall vitality, viability and attractiveness. In this context, we suggest that the content of the emerging site allocation should read: 'The Hartfield Road Car Park site will optimise the opportunity to extend the existing Morrisons store.' We should be grateful if you would acknowledge receipt of our representations and keep us updated with all progress.	Not taken forward. The representation also requests that the ground floor of the site be specifically allocated for expansion of adjoining the Morrisons supermarket. This level of detail cannot be achieved from a strategic planning perspective. The council has allocated the ground floor of the site for retail use among others, which many different types could contribute to the vitality and vibrancy of the town centre. To specify that the site must be for a specific user would also create potential conflicts with other commercial interests which is not a component of strategic planning. Any future development on the site will be subject to Policy DM R1 at the time of development. It is therefore considered that the text will not be amended as suggested to include reference to the expansion of the Morrisons store.
<b>R068/C218</b>	Thames Water	Site 02 Palestine Grove, Colliers Wood	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: <b>"Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."</b>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R089/C425	Internal	Site 05 Colliers Wood Community Centre	Correct spelling of drainage on pg225	Agreed. The text has been amended.
R068/C219	Thames Water	Site 05 Colliers Wood Community Centre	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R068/C220	Thames Water	Site 08 Leyton Road Centre, Colliers Wood	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R068/C221	Thames Water	Site 09 Mitcham library	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R027/C097c	GLA	Site 12 Queens Road car park, Wimbledon	The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.	The site has been removed from the plan prior to pre-submission (stage 4)
R068/C222	Thames Water	Site 14 Taylor Road day centre	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R024/C075	Flaherty J	Site 15 West Barnes library	I would like to feedback on the proposed development of West Barnes library. I think the plans are a positive step for both the library service and the local area. A larger library site would allow a greater range of resources / activities to be offered and thereby increasing local usage. I would however stress that as a local community service it MUST have toilet facilities. Having used this (my local) library with my own family it is really annoying and off-putting when there is no facilities for toilets. We have often had to leave the site prematurely to seek facilities elsewhere – Not ideal with young children Some parking (as currently offered) would also be a positive to maintain. I think it is an exciting opportunity for Merton Libraries as well as for Motspur Park residence.	It is council policy for all council libraries to contain toilets available for public use during library opening hours. No change to the wording is therefore required.
R068/C223	Thames Water	Site 15 West Barnes library	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R050/C172	Nicholson JD	Site 15 West Barnes library	Site Proposal 15 West Barnes Library is looked under Morden (P211) and Raynes Park (p212). Details appear on pages 286/9 and 310/311. One would expect this particular proposal to be included under Raynes Park.	The formatting of the document will be amended to ensure each site is situated within one sub-area only.
R040/C126a	Mallon M	Site 16 Wimbledon library	Please no change to the use of the Wimbledon library building. Keeping it simple – no resi. on top – the whole thing should stay as it is. Wimbledon Park lost its library and it is now a café don't repeat the error – once it is gone it is gone. It is not the Council's right to change things like this – you are custodians not owners of public facilities;	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R002/C009	Avery L	Site 16 Wimbledon library	* Mothers attending the Storytelling/Singalong**sessions (held several times a week). The majority of these Mums turn up with pushchairs .....how would they manage the stairs each morning??. A First Floor location would be completely impractical. (**Hugely popular, with on average of c 40 Mums with children coming along). * Computer Room: Even with c24 computers, by lunchtime this is often operating @ 100% capacity (with people queueing for the next available machine). If the number of computers were to be downscaled, it would have considerable impact+++ on those without computer access who are (for example) looking for jobs (+++particularly given the only Internet Cafe in W/Don (at the other end of the Broadway) is soon to close). * Students: Post school/every Half Term/Holiday every single seat and desk is taken up by schoolchildren/students doing homework/studying for exams...the Library is virtually "bursting at the seams" during this time.. These schoolchildren/students need a quiet environment in which to work, which (being alongside a quiet residential street) the current location provides. Location in the Town Centre would affect this aura of peace and tranquillity considerably. Additionally, I am concerned (given they struggle to find a spare spot in its current size) whether a new facility would be able to provide such a large seating area.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R074/C279a	Wallace .S	Site 16 Wimbledon library	1) I am strongly in favour of retaining the whole Wimbledon library building for library and community use - it should not be used in part for retail or commercial purposes - Wimbledon has more than enough retail establishments but very little community space.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R002/C008	Avery L	Site 16 Wimbledon library	And a question for everyone involved with this shameful proposal. What will happen (if the Library is relocated) to the wonderful (28 in total) murals (of varying sizes) in the Library?? These were painted in 1947 by W/Don Art Students, so have true historical value and by 2019 (planned implementation date) they will have been in existence for 70+yrs. These were described (in The Wimbledon Borough News) at the time as "The "fulfilment of a dream long ago". The children's library is now a work of art. Students transform a "Victorian warehouse" at their own expense and in their own time". So much for having a dream.....bet they will wish they hadn't bothered if this plan goes ahead!!	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R002/C004	Avery L	Site 16 Wimbledon library	And before I am accused of paranoia, what I find telling are the "evolving" conflicting statements from Cllr Judge in this week's W/Don Guardian. Specifically: * "We have absolutely no plans to move the library at all" * "Adding (to the Sites & Policies document) wording (proposed @ the Council Meeting and rejected) stymies what we could do with the existing site and would prevent us from examining the potential for a new better library. * "We do not know what opportunities will occur in W/Don Town Centre over the next few years and if a site became available that allowed us to build a much better library and community facility in the middle of the town centre, we would want to examine it seriously"	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R032/C108	Jauffret C	Site 16 Wimbledon library	Any consultation Merton claims to have done has been wholly inadequate as the advert was in the local guardian paper which is no longer delivered to all homes in the borough, indeed the distribution to homes has lessened. The ad made no direct reference to the Library site. It is extremely odd that you failed to refer to it in your own publication MY MERTON which you deliver to every home. This would seem to be incompetent at best and underhand at worse. Sadly, the latter seems the more likely. This is our space and as such needs a full, open discussion about it's future.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R050/C173a	Nicholson JD	Site 16 Wimbledon library	As stated previously although it is intended to increase the customer floor area and this must not be at the expense of the study area which is well used by the local community and should be kept separately from other areas of the library.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R002/C002	Avery L	Site 16 Wimbledon library	Currently this site has the following (granted) usage: Library (D1); Adult Education (D1) and x1 Apartment (C3). Short of the construction of a hotel(!!) - as on other site applications listed in your latest document - the requests for this site are "all encompassing" ( to allow as many permutations as possible for the Council further down the line).	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R004/C013a	Bazley .J	Site 16 Wimbledon library	During the years I have lived in Wimbledon far too many community assets have been lost, starting with the Civic Hall which was to have been replaced. It turns out that that generation of politicians were lying, 'economical with the truth'...or hopelessly naive. Nowadays the general public is understandably cynical .	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R002/C010b	Avery L	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R004/C013b	Bazley .J	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R007/C025b	Chapman S	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R008/C026b	Chibnall M	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R009/C027b	Collier F	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R013/C043b	Craggs P & D	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R015/C047b	Davey E	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.



Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R061/C191b	Snell J	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R067/C208b	Telfer J	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R071/C270b	Tolmie M	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R074/C279b	Wallace .S	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R081/C390	Wimbledon Society	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R087/C386	Terrafranca L (WEHRA)	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R088/C405	McManus P	Site 16 Wimbledon library	General comments referring to opposition of the Wimbledon library site being contained in the Sites and Policies Plan. Opposition to allocation. Opposition to potential redevelopment. Opposition to loss of library and community facility. Opposition to any alternative uses being on the site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R016/C048a	de MONTES M	Site 16 Wimbledon library	I am against the plans for the Wimbledon Library. I live at xx,xxxxxxxxxxx Road, SW19 xxxx, I and my family use the library. I think it is important taking into consideration all the schools that are in the area. This is a residential area and there is not another library near. The building is one of the most attractive in Wimbledon. The Library has an art gallery that is used constantly, it is a true community space. I want to be invited to the consultations	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R008/C026a	Chibnall M	Site 16 Wimbledon library	I am concerned about the planned redevelopment of the Wimbledon Library site, and would like to go on your mailing list for information about future proposals concerning it	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R059/C188a	Smart M	Site 16 Wimbledon library	I am concerned about the proposed changes to Merton Library as follows: The present library, which is not particularly large, will be reduced in size, and, therefore, presumably also in services, for the several other proposed allocations.  I would object to business or commercial operations on the site, other than perhaps a cafe, which might bring in income and prospective readers into the library.  As a locally listed building it, and Marlborough Hall, with their external and internal features, should be retained as they are, being an historical and important part of Wimbledon Hill Road.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R004/C012	Bazley .J	Site 16 Wimbledon library	I am writing to register my extreme disquiet that future plans for the Wimbledon Library site have 'been out for consultation' for several months without the general public or even the majority of Councillors being aware of the implications. I accept Councillor Andrew Judge's assurances that there is no immediate threat to library provision ,but as his stated intention is to make sure that any future council has its options open (verbally to me this morning) I am certain that it is essential to defend an important community space.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R033/C110a	Jeans G	Site 16 Wimbledon library	I am writing to register my objection to the closure of Wimbledon library. This is an invaluable community resource - my daughter goes often. It is used by a-level and gcse students for revision and coursework.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R032/C107	Jauffret C	Site 16 Wimbledon library	I have already written to express my objection to any change of use to Wimbledon library. The library was gifted to the people of Wimbledon and as such remains the property of the community. Any proposed changes to it should be widely advertised to every house in the borough. The current library is an iconic building in the heart of Wimbledon which is popular and much used. It should not be altered in any way o the outside and, any proposed change inside should only be to modernise and enhance library facilities and make more of the building for public rather than commercial use.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R067/C208a	Telfer J	Site 16 Wimbledon library	I have been a member of Wimbledon Library since 1943, and am well aware of its value to the neighbourhood. The last phase of improvements, [apart from the deplorable shrinkage on the reference section] is pleasing and comfortable, with plenty of sitting space for those who need it. I was glad to notice that those responsible have decided to rescind the totally unnecessary inclusion of the building in the Sites and Policies Plan---we do not need any more restaurants, shops, etc., in the neighbourhood!!! however, I would suggest that if there is any money available for the IMPROVEMENT of the present beautiful Victorian building, a LIFT to the upper "hall" would allow many regular visitors to access exhibitions, displays and sales held there! I now walk with a walking-aid, as do several of my neighbours, and can no longer climb the stairs, which no doubt also present a problem to those pushing buggies. The building is well-used by many local groups, students, researchers, etc., Please leave it as it is!!!	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R007/C025a	Chapman S	Site 16 Wimbledon library	I have heard that the Wimbledon Library is a site to be redeveloped. I have seen no invitation to consultation on this suggestion and greatly object to a decision being made about such a valuable public facility without proper information being made openly and widely available to the public, with the possibility for users of the library to take part in the 'consultation'. I object to consultations being a hidden process. I object to the library site being developed without knowing whether or not there are positive proposals to keep a public library in the centre of Wimbledon. this is very underhand council proceedings	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R021/C057a	Elson D G	Site 16 Wimbledon library	I have heard through the grape vine that a change of use is being proposed for the Wimbledon Library premises and part will be sold or leased to private interests. I find this very concerning and do not remember any communications making this clear to Wimbledon residents. I think the library provides an excellent service to residents and has improved that service over recent years. I would like an opportunity for residents to vote on a specific plan. Voting on change of use would be a good start but not enough because the proposals would seem to allow the council to do whatever they like with the premises. Why do we need this change? What benefits would current or potential users gain from it? I would be grateful for more information	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R039/C123	MacManus P	Site 16 Wimbledon library	I have just heard that the Council is proposing to demolish Wimbledon Library I wish to formally protest –surely as a loved feature of our town this is a protected building ? Also I am concerned about the Dundonald school scheme of building on protected land also revoking covenants	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R042/C136a	McTernan W	Site 16 Wimbledon library	I have just heard today of the plans to redevelop the Wimbledon Library site and would like to have a look at the proposal/s - please direct me to where they sit on the website. It is a lovely building which, I would agree, needs some investment without changing its inherent character.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R017/C049	Dibartolo A	Site 16 Wimbledon library	I have read with horror the plans to “redevelop” Wimbledon Library. Please leave this alone. We don't need any more retail spaces, offices or eating establishments in Wimbledon. I haven't been a user of the Library in Wimbledon for very long, but have found it invaluable so far, and will be very angry if it is removed. What makes me even angrier is the ridiculous sum of money spent on the piece of “art” outside Wimbledon mainline station, and the whole redevelopment of that area	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R002/C007	Avery L	Site 16 Wimbledon library	I see that the Council has already put its publicity machine in operation on its London Borough of Merton website home page, where it has the sub head .....“Council confirms commitment to Wimbledon Library”. In this Cllr Drapper states: "There is no truth in the bizarre rumour that it (W/Don Library) could close or change its use". In fact, this isn't what the "rumour" is at all. What residents are concerned about is not the fact that it might close (I don't think even Labour would have the gall to do this) but that it move either to the First Floor or (worse) to the Town Centre. . Tellingly , Cllr Drapper doesn't actually go as far as putting in writing the key words "and it will remain in its current location", so this PR piece (on the website) is a blatant case of "smoke and mirrors". Particularly when read in conjunction with the comments made by Cllr Judge in the W/Don Guardian.. This stealth plan is a travesty and goes against everything the Covenant originally intended.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R019/C052	Drinkwater A	Site 16 Wimbledon library	I sincerely hope that public opinion, & common sense will prevail, & that Wimbledon library building will not be changed in any way. As a locally listed building, since being built in Victorian times, it is a valuable asset to the community. People like me who is sending you this mail from the computer room	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R051/C174a	Paetke S	Site 16 Wimbledon library	I understand that Merton Council has plans to close the present Wimbledon Library: I strongly object. I also gather that there is a consultation underway that I, and all others I have so far asked, have no knowledge. I wish to be briefed by the Council on all relevant information well before any deadlines.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R057/C185	Rutherford E	Site 16 Wimbledon library	I was appalled last week to find out that consultations have been in progress regarding plans to close Wimbledon library. Despite using the facilities on a regular basis and both living and working in Central Wimbledon, I have had no previous knowledge of this proposal. I have not been informed as a Wimbledon resident via my local newspaper or through direct mail from the council.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R057/C185a	Rutherford E	Site 16 Wimbledon library	I was appalled last week to find out that consultations have been in progress regarding plans to close Wimbledon library. Despite using the facilities on a regular basis and both living and working in Central Wimbledon, I have had no previous knowledge of this proposal. I have not been informed as a Wimbledon resident via my local newspaper or through direct mail from the council.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R009/C027a	Collier F	Site 16 Wimbledon library	I wish to be contacted regarding the consultation on Wimbledon Library, being that I strongly oppose loss of use of the building as it currently is.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R058/C186	Sheehan S	Site 16 Wimbledon library	I would ask for all reference to Wimbledon Library/Marlborough Hall site to be removed	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R058/C186	Sheehan S	Site 16 Wimbledon library	I would ask for all reference to Wimbledon Library/Marlborough Hall site to be removed	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R015/C046	Davey E	Site 16 Wimbledon library	I would like this site to be used for the community. I would not like it to be developed for retail, financial or professional services definitely not for restaurants or cafes or commercial offices. I do not think it should be developed for council rented flats as this would spoil the character and architecture of the building	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R043/C137a	Mellors J	Site 16 Wimbledon library	I would like to express my concerns about the Council's plans for the future of Wimbledon Library. I do not wish it to be converted into a commercial space; Wimbledon needs its few 'non-commercial' spaces preserving; my thoughts are in line with those expressed by the Wimbledon E Hillside Residents' Assn (WEHRA), a copy of which is attached below. <a href="http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/sites_policies_dpd/wimbledon_e_hillside_march_2012.pdf">http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/sites_policies_dpd/wimbledon_e_hillside_march_2012.pdf</a> I am also concerned by the fact that I do not feel I was properly consulted over the future of the library, and I suspect that my fellow residents at Wimbledon Central are broadly ignorant of the Council's plans on this matter.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R061/C190	Snell J	Site 16 Wimbledon library	I would like to respond to your consultation I'm keen to ensure Wimbledon Library facilities are not diminished. I am not against redeveloping the back of the site but I'd like to still be able to walk through the front door into a welcoming and well-stocked library.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R053/C176a	Pountain J	Site 16 Wimbledon library	I would like to support the following statement: "The Wimbledon Library site should remain 100% publicly owned and run for the use of all."	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R079/C287	Wimbledon E Hillside Residents' Assn (WEHRA)	Site 16 Wimbledon library	I write to express our unhappiness with the proposals for Wimbledon Library that remain included in the LDF, as it moves towards becoming a formal document for Merton for future development.  Our Association members have spent dozens of hours of their personal time reviewing the many documents and drafts, and we wrote you a constructive and thoughtful letter to the Council with the views of our local community – representing the ten roads and 800 households surrounding the Library. Why have you not listened to our views? Why bother with any Consultation, if you and the 'Regeneration Officer' are bent on pushing forward with the disposal of the Library site, in favour of a 'modern solution' elsewhere? This library serves WIMBLEDON. Wimbledon Schools are taken to the library every day of the week, and hundreds of local people use the library for a great deal of services	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R019/C053	Drinkwater A	Site 16 Wimbledon library	If funds need to be raised, I am sure another way could be found, & not to deny the people of the Borough something they have come to depend on for many different reasons. Not just for books, & computer services, but courses, & help for all students, both young & mature.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R002/C010a	Avery L	Site 16 Wimbledon library	IN CONCLUSION: This whole thing smacks of "selling the family silver". The Library (in its current location in the beautiful listed building) is the "beating heart" of the local Wimbledon community and is also used by the myriad number of visitors who come to Wimbledon.....who sometimes use the facilities themselves and who often take photographs en route to watch the tennis/visit the Museum (there)/etc. To hide it away on the First Floor (or worse, the Town Centre ...which will get no passing visitors) is a disgraceful act (should it come about). And what unseemly haste re the potential implementation....almost days after the end of the Covenant . The current location is "position perfect" for visitors and the immediate local community, plus it is also within a c4 mins walking distance of several schools.....relocating it to a Town Centre position would thus (potentially) disincentivise these children from using it.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R081/C389	Wimbledon	Site 16	It is understood that the council is removing the site from the plan.	The site is being recommended to be removed from the plan as a result of

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
	Society	Wimbledon library		all the consultation responses received.
R056/C184	Rooney Anne	Site 16 Wimbledon library	It is with great dismay I have learnt that yet again, Merton is planning the destruction of one of the few remaining historic buildings in the town. Apart from the fact we will lose our Library - maybe of little consequence and of no value to Merton councillors, but to a great many residents it is a valuable resource, never mind the architecture. I have not been informed of this - why are Wimbledon Residents kept in the dark and why is your consultation is in August - holiday time. It is apparent that the culture at Merton Council is one of non-transparency and complete disregard for council tax paying residents. You have allowed monstrosities to be built in the town and destroyed any character it had with obvious contempt. What benefits were there to the Council from all the companies who inhabit the ugly buildings in the Broadway??? There are certainly one to Residents. I would like you to leaflet and inform all your taxpayers before any consultation takes place as is our democratic right.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R056/C184a	Rooney Anne	Site 16 Wimbledon library	It is with great dismay I have learnt that yet again, Merton is planning the destruction of one of the few remaining historic buildings in the town. Apart from the fact we will lose our Library - maybe of little consequence and of no value to Merton councillors, but to a great many residents it is a valuable resource, never mind the architecture. I have not been informed of this - why are Wimbledon Residents kept in the dark and why is your consultation is in August - holiday time. It is apparent that the culture at Merton Council is one of non-transparency and complete disregard for council tax paying residents. You have allowed monstrosities to be built in the town and destroyed any character it had with obvious contempt. What benefits were there to the Council from all the companies who inhabit the ugly buildings in the Broadway??? There are certainly one to Residents. I would like you to leaflet and inform all your taxpayers before any consultation takes place as is our democratic right.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R013/C042	Craggs P & D	Site 16 Wimbledon library	It would seem tragic to reduce, minimise, or change this wonderful facility for the sake of further shops or restaurants, and it would also be iniquitous to move the library to an alternative position. If anything, the library staff need to be supported by the reassurance of continued funding and security for the future	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R058/C187	Sheehan S	Site 16 Wimbledon library	My justification being that the present wording is far too broad and open-ended and the word "appropriate" is imprecise. As a result policies DM R6 and DM C1 for the retention of, respectively, culture arts and tourism facilities and community facilities are undermined.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R058/C187a	Sheehan S	Site 16 Wimbledon library	My justification being that the present wording is far too broad and open-ended and the word "appropriate" is imprecise. As a result policies DM R6 and DM C1 for the retention of, respectively, culture arts and tourism facilities and community facilities are undermined.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R002/C003	Avery L	Site 16 Wimbledon library	My overarching concern is thus that this application is far too "open ended" and that it is unfair for you to expect members of the public to fully appreciate what could happen should these proposals be approved. I therefore feel that before this application is carried forward, specific detail should be included. This is what members of the general public have to do when submitting an application and I do not see why the Council should not be at least as "accountable" as "the people they serve" .....if not more so. It all smacks of "development by stealth".	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R068/C224	Thames Water	Site 16 Wimbledon library	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R068/C224	Thames Water	Site 16 Wimbledon library	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R015/C046	Davey E	Site 16 Wimbledon library	Opposition to redevelopment of the Wimbledon library.	The Wimbledon library site is to be removed from the Sites and Policies Plan.
R013/C043a	Craggs P & D	Site 16 Wimbledon library	Perhaps the only thing that does need to be changed is the re-opening of the toilet facilities, or alternative provision in Wimbledon town - it is a scandal that a town of this importance has no toilet facilities, particularly considering the number of people using the centre - the facilities on the station are not adequate, and are within the ticketing zone.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R071/C270a	Tolmie M	Site 16 Wimbledon library	Please don't close Wimbledon library. I have friends in other towns in England where this has happened, and you don't realise how huge the impact is until it's too late, and the library building is sold off for yet another (unnecessary) retail purpose. Libraries are so important, and the one at Wimbledon is particularly good and the staff are excellent. Without it, Wimbledon will lose an important centre of free public reference and literature	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R017/C050a	Dibartolo A	Site 16	Progress isn't always a good thing, so please bear this in mind before simply selling off vital public services	The site is being recommended to be removed from the plan as a result of

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
		Wimbledon library		all the consultation responses received.
R032/C109a	Jauffret C	Site 16 Wimbledon library	Provision for the future of Wimbledon Community Centre is sketchy. I object to any change of space or venue for this centre. The library and the centre are popular, widely used and appropriately located in the heart of town where a community building should be. When I requested Merton to direct me to the plans/proposals I was directed to the general search screen which conveniently didn't result in any useful search. Please provide me with a specific link to all actual information on THIS project.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R002/C005	Avery L	Site 16 Wimbledon library	<p>Specifics (per application):</p> <p>* Retail (A1): Permission to NOT BE GRANTED. This application "opens the door" to the Ground Floor no longer being used as a Library (as no potential Retailer would want a shop positioned on the First Floor as it would be away from "passing trade")</p> <p>* Restaurants &amp; Cafes (A3): Permission to NOT BE GRANTED for precisely the same reasons as quoted above for Retail. Additional reasons for not granting permission would be that:</p> <ul style="list-style-type: none"> <li>- Having these along the Compton Rd side could have a real (noise pollution) impact on this (currently) quiet tree-lined residential road (full of local families). Noise (from departing revellers) has previously been a problem with All Bar One (who occupy the corner site at the top of this road) and with the outdoor drinking/dining @ The Alexandra (which fronts onto St Marks Place). Having even more dining establishments opening will exacerbate the problem.</li> <li>- Any creation (of such establishments) would adversely affect the already dire parking situation in this street where, because the front gardens are so small/majority of houses are semi-detached, none of the owners have driveways/garages and already struggle to find a parking space.</li> </ul> <p>* Professional Services (A2) &amp; Office (B1): Permission to be granted only if it applies to Marlborough Hall/top floor of Library and if specific mention is made that it is NOT applicable to the Ground Floor area currently occupied by the Library.</p> <p>* Residential (C3): Permission to be granted only if it applies to Marlborough Hall/top floor of Library and if specific mention is made that it NOT be applicable to the Ground Floor area currently occupied by the Library.</p>	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R050/C173b	Nicholson JD	Site 16 Wimbledon library	The library floorspace should be retained at its current level.	The site is proposed to be removed from the Sites and Policies Plan.
R026/C081	Gilbert J	Site 16 Wimbledon library	The library is an essential asset for Wimbledon and I would strongly oppose anything that made it less accessible or reduced in size in any way.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R027/C097d	GLA	Site 16 Wimbledon library	The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.	The site is proposed to be removed from the Sites and Policies Plan.
R019/C054a	Drinkwater A	Site 16 Wimbledon library	The Wimbledon library has so much to offer, so please don't deny it to the people of Merton	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R002/C006	Avery L	Site 16 Wimbledon library	These plans have already caused huge condemnation in the immediate area and despite protestations by a variety of (Labour) Councillors that nothing "untoward" is afoot, this doesn't "ring true" (given the lack of specifics/comments made in the press). If nothing Machiavellian/untoward is truly the case, then I don't see why there can't be more transparency in what is being proposed/a caveat included that the Library will remain on the Ground Floor in the current location, occupying the same amount of space. And even if the Council is (genuinely) wedded to it remaining @ 35 W/Don Hill Rd (though all the signals are to the contrary) even relocating any part of it to the First Floor would have an adverse effect on all, in particular:	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R079/C288	Wimbledon E Hillside Residents' Assn (WEHRA)	Site 16 Wimbledon library	<p>We are very much against any commercial use of the existing Library site. This building was given to the community for our education and enlightenment. No bar, coffee shop, bank or retail premises will support those lofty aims. And increased commercialization of this site will mean a guaranteed and dramatic loss of amenity to surrounding homeowners; existing problems with parking, litter, drunks and anti-social behaviour will only be intensified.</p> <p>Please amend the section on Wimbledon Library to retain the building for community use.</p>	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R013/C040	Craggs P & D	Site 16 Wimbledon	We write to support the continuation of Wimbledon Public Library and all its facilities in its present position, retaining the present building and access. The building is very well placed in a focal position in Wimbledon centre, it is one of	The site is being recommended to be removed from the plan as a result of all the consultation responses received.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
		library	the few remaining buildings with history, which gives it a local importance and, from our own observations, it is very well used.	
R013/C041	Craggs P & D	Site 16 Wimbledon library	Whenever we go into the library, there are many, many people using the library services, often children having special sessions and, of course, latterly a usually full house of computer users, as well as almost every seat being taken in the reference part of the library by a very broad cross-section of the community	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R081/C344	Wimbledon Society	Site 16 Wimbledon library	Wimbledon Library: site 16: page 337: It is understood that the Council, following recent statements, is removing this site from the Plan in its entirety; accordingly, no further comment is offered. Should this not be the case, the Society would wish to make comments on whatever is being proposed.	The site is being recommended to be removed from the plan as a result of all the consultation responses received.
R045/C149	Mitcham Cricket Green Community and Heritage Group	Site 17 Worsfold House / Chapel Orchard, Mitcham	13. We believe Worsfold House provides a significant area for potential development, generating community infrastructure levy for the benefit of the neighbourhood. We support residential use and recognise the potential to consider the best location for this through relocating some of the existing educational uses. We ask that consideration be given in the final document to addressing two issues in the Cricket Green Charter through: Enhancing public access between Church Road and London Road Playing Fields as part of any scheme; Use of a Community Land Trust to undertake the development.	Noted with thanks. General support for the allocation. The Sites and Policies Plan does not dictate how CIL funds will be allocated.
R041/C134a	Mayor's office for Policing	Site 17 Worsfold House / Chapel Orchard, Mitcham	The revised list of sites outlined in Part II have been assessed and it is noted that a number of them have the potential to facilitate development on a scale which would potentially have an impact on the policing needs of the area. Many already have a reference to the provision of community facilities on site whilst other sites are no longer listed. The sites which do not include reference to community facilities but are considered to have the potential for development which may impact on the policing needs are outlined below: <b>01 - 'P3' Hartfield Road Car Park</b> , Car Park Site of No. 66-84, Hartfield Road, Wimbledon SW19 3TB <b>17 - Worsfold House / Chapel Orchard</b> , Church Road, Mitcham, CR4 3BE <b>19 - Nelson Hospital (including car park)</b> , 220 Kingston Road, Raynes Park, London SW20 80B	Noted. In line with Merton's planning policies, the potential impact on local infrastructure will be considered as part of a planning application once the scale and form of development is known. It should be noted that the Nelson Hospital site was removed from the plan in early 2012 after planning permission was granted to build a new hospital and sheltered housing on the site (construction has now started). It should also be noted that it is the council's view that proposals for Wimbledon Greyhound Stadium also have the potential to impact on policing needs; anyone with proposals for the site has been advised to contact a named officer in the Met Police at an early stage (pre-application)
R041/C134b	Mayor's office for Policing	Site 17 Worsfold House / Chapel Orchard, Mitcham	The site does not include reference to community facilities but are considered to have the potential for development which may impact on policing needs.	This site is not contained in the Sites and Policies Plan which is to be submitted to the Secretary of State.
R068/C225	Thames Water	Site 17 Worsfold House / Chapel Orchard, Mitcham	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development [ Sewer capacity assessment carried out for sites 37017, 37022, 37021 and 37013 which are likely to discharge to the same sewer hence sewer capacity issues identified] . Drainage Infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development. On the information available to date we do not envisage infrastructure concerns regarding potable water capability in relation to this site	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."
R068/C226	Thames Water	Site 18 60 Pitcairn Road, Colliers Wood	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R041/C135a	Mayor's office for Policing	Site 19 Nelson Hospital	The revised list of sites outlined in Part II have been assessed and it is noted that a number of them have the potential to facilitate development on a scale which would potentially have an impact on the policing needs of the area. Many already have a reference to the provision of community facilities on site whilst other sites are no longer listed. The sites which do not include reference to community facilities but are considered to have the potential for development which may impact on the policing needs are outlined below: <b>01 - 'P3' Hartfield Road Car Park</b> , Car Park Site of No. 66-84, Hartfield Road, Wimbledon SW19 3TB <b>17 - Worsfold House / Chapel Orchard</b> , Church Road, Mitcham, CR4 3BE <b>19 - Nelson Hospital (including car</b>	Not taken forward. The Nelson Hospital site was removed from the plan in early 2012 after planning permission was granted to build a new hospital and sheltered housing on the site (construction has now started).

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			<b>park),</b> 220 Kingston Road, Raynes Park, London SW20 80B	
<b>R041/C135b</b>	Mayor's office for Policing	Site 19 Nelson Hospital	The site does not include reference to community facilities but are considered to have the potential for development which may impact on policing needs.	Not taken forward. The Nelson Hospital site was removed from the plan in early 2012 after planning permission was granted to build a new hospital and sheltered housing on the site (construction has now started).
<b>R045/C150</b>	Mitcham Cricket Green Community and Heritage Group	Site 20 Wilson Hospital, Mitcham	12. We support continuing health use for this site. If this were to cease then we believe consideration could additionally be given to sensitively designed hotel uses alongside the other suggested uses. Any development should also be required to enhance public access and provide new access routes to Cranmer School to reduce the impact of the "school run" on local roads.	Noted. The representation is general support for the allocation for retention of health uses. C1 uses have not been allocated on this site because it was not suggested by the owner and is not considered a suitable location by the council being an out of centre location.
<b>R068/C227</b>	Thames Water	Site 20 Wilson Hospital, Mitcham	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
<b>R045/C151</b>	Mitcham Cricket Green Community and Heritage Group	Site 21 Birches Close, Mitcham	10 We support a significant re-think in the design, layout and re-use of this site which is currently a mess and poorly used. While supporting healthcare and related uses the final document needs to acknowledge the constraints due to the sensitive access along Cricket Green, as recognised by the Cricket Green Charter: "Retaining and enhancing the character of Cricket Green road running alongside the east of the cricket ground should be a starting point for any future development in Birches Close or at Brook House" 11 We believe any development should be required to integrate better with Cricket Green by visually and functionally drawing the open space into the site.	General support for the allocation. The allocation states the numerous constraints regarding access, design, the conservation area, and the adjoining Cricket Green open space. The redevelopment of the site will be subject to policy regarding these matters at the time a planning application is made.
<b>R068/C228</b>	Thames Water	Site 21 Birches Close, Mitcham	On the information available to date we do not envisage infrastructure concerns regarding potable water capability in relation to this site. We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development [Sewer capacity assessment carried out for sites 37017, 37022, 37021 and 37013 which are likely to discharge to the same sewer hence sewer capacity issues identified] . Drainage Infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."
<b>R081/C391</b>	Wimbledon Society	Site 21 Birches Close, Mitcham	These sites face onto the Cricket Green, an area that whilst not in the immediate area of Wimbledon, nevertheless has a very significant history in Merton, including that of the evolution of the birth of Cricket. The present Cricket Pavilion is separated from the actual playing pitch by the very busy A239 (also called Cricket Green). This arrangement might have been acceptable in past years, but is now far from ideal with modern traffic conditions. These two sites 21 & 53 face onto the cricket pitch, and are separated from it by a very much quieter cul-de-sac. Might this present an opportunity to provide a new Pavilion on their road frontage, (with suitable development at the rear), and develop the then vacated existing Pavilion in due course?	Not taken forward. The council has not received any information to suggest that the existing cricket pavilion should be redeveloped. The site is currently leased by the cricket club who intend to remain on the site. The existing cricket pavilion is a locally listed building and therefore has existing policy restrictions on redevelopment. As a result, the suggestion made is not being considered as part of the Sites and Policies Plan.
<b>R068/C229</b>	Thames Water	Site 22 Patrick Doody Clinic, Wimbledon	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
<b>R068/C230</b>	Thames Water	Site 23 Amity Grove, Raynes Park	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
<b>R068/C231</b>	Thames Water	Site 24 Morden Road health centre	On the information available to date we do not envisage infrastructure concerns regarding potable water capability in relation to this site. We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development [ sewer capacity assessment carried out for sites 37028, 37032 and 37030 which are likely to discharge to the same sewer hence sewer capacity issues identified]. Drainage Infrastructure is likely to be required to ensure	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.	capacity will be provided."
R081/C345	Wimbledon Society	Site 28 P4 Lan adjoining Wimbledon Theatre	<p>Add: "This COUNCIL OWNED site is CURRENTLY a surface car park "</p> <p>It is important that this is said as the Council has a direct control over the future of this site as owner, not merely as a planning authority.</p> <p>As written, the open-ended nature of the list of potential uses allows for a future developer to select only those that are currently commercially attractive:</p> <p>The other uses, although listed, may simply never be provided.</p> <p>This site is located beside the Theatre, and is within the zone (extending eastwards to the Polka Theatre) that is identified in the Wimbledon Way study as an area primarily for culture and the arts.</p> <p>This is part of the approach to widen the offer of the Town Centre so that the overall attractiveness and prosperity of Wimbledon is improved.</p> <p>Accordingly it should be clearly stated that the Allocated use should be:</p> <p>"THE PRINCIPAL USE OF THE LOWER LEVELS SHOULD BE FOR CULTURAL, ARTS, LEISURE AND COMMUNITY, AND ANY OTHER USES SHOULD BE ANCILLARY."</p> <p>Given that the Council is the owner of the site, this can be a clear legal requirement when the time comes for the Council to dispose of the lease.</p> <p>As the Council is also the owner of the freehold of the adjoining Theatre, there could be advantages in encouraging a linking up of the two sites, should this be desired by the Theatre's operators.</p> <p>Additionally, this is a site that should be identified as a potential contributor to a Town Centre CHP scheme (see comments on policy DMEP1).</p> <p>The loss of parking could be a significant issue for the well-being of this part of the Broadway: ADD therefore: "THE REQUIREMENT FOR SOME PUBLIC CAR PARKING TO SERVE THIS END OF THE BROADWAY IS TO BE ASSESSED PRIOR TO ANY SITE DISPOSAL".</p>	Not taken forward. The site owner is not a relevant planning policy consideration with regard to the development of the site. It is considered that the existing wording within the site allocation has appropriate reference to the need to assess future parking demands on and around the site as a result of development.
R081/C392	Wimbledon Society	Site 28 P4 Lan adjoining Wimbledon Theatre	<p>It is important that this is said as the Council has a direct control over the future of this site as owner, not merely as a planning authority.</p> <p>As written, the open-ended nature of the list of potential uses allows for a future developer to select only those that are currently commercially attractive. The other uses, although listed, may simply never be provided. This site is located beside the Theatre, and is within the zone (extending eastwards to the Polka Theatre) that is identified in the Wimbledon Way study as an area primarily for culture and the arts. This is part of the approach to widen the offer of the Town Centre so that the overall attractiveness and prosperity of Wimbledon is improved. Accordingly it should be clearly stated that the Allocated use should be:</p> <p>"THE PRINCIPAL USE OF THE LOWER LEVELS SHOULD BE FOR CULTURAL, ARTS, LEISURE AND COMMUNITY, AND ANY OTHER USES SHOULD BE ANCILLARY."</p> <p>Given that the Council is the owner of the site, this can be a clear legal requirement when the time comes for the Council to dispose of the lease.</p> <p>As the Council is also the owner of the freehold of the adjoining Theatre, there could be advantages in encouraging a linking up of the two sites, should this be desired by the Theatre's operators. Additionally, this is a site that should be identified as a potential contributor to a Town Centre CHP scheme</p>	Not taken forward. The allocation does not preclude the type of development suggested within the representation. The site allocation provides for a range of uses which enables a degree of flexibility with regard to the future development of the site and the commercial viability of development given various constraints. Flexibility is provided with the allocation which is situated in Wimbledon town centre. This is consistent with town centre development and policies with the idea of creating a vibrant and viable town centre. It is also consistent with the NPPF 2012 to ensure a new development can be delivered on the site in accordance with existing and emerging policy. It is not considered appropriate to allocate the site principally for cultural, arts, leisure and community uses for several reasons. Firstly, the viability of such a development is questionable and no party has approached the council or provided information to suggest that such a scheme would be deliverable, as required by the NPPF. If it was viable, the allocation enables such a development to occur. Emerging policy regarding combined heat and power scheme will govern how such services are provided.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R062/C193	Sport England	Site 28 P4 Lan adjoining Wimbledon Theatre	<p>Planning Policy Objective 2 within Sport England's Spatial Planning for Sport and Active Recreation: Development Control Guidance Note (2009) Appendix (<a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/</a>), aims to prevent the loss of existing sports facilities. Sport England opposes the redevelopment of such facilities, unless equivalent or better replacement facilities are provided (in terms of quantity, quality and accessibility) in a suitable location. The only exception to this policy is where it can be proved that the facility is genuinely redundant and there is no demand for a replacement based on a thorough local assessment.</p> <p>Furthermore, Sport England evidence, based on outputs from the Facilities Planning Model (FPM), shows certain provision issues in relation to strategic built community sports facilities such as sports halls, swimming pools and synthetic turf pitches. It is therefore essential that the above Planning Policy is applied.</p> <p>Sport England objects to the allocation of the land at the above sites unless the above policy is fulfilled. Leisure facilities are proposed (or are potentially proposed) for the following sites:</p> <ul style="list-style-type: none"> <li>• P4 Land Adjoining Wimbledon Theatre</li> </ul>	Noted. The representation states that the site includes an allocation for leisure facilities.
R074/C280	Wallace .S	Site 28 P4 Lan adjoining Wimbledon Theatre	The car park adjacent to Wimbledon Theatre should be used for a possible community venue, not for further retail establishments.	Noted. The allocation includes the ability to establish a community venue. Presently the council considers there to be sufficient community space within Wimbledon. The allocated uses on the site accord with Merton's Core Planning Strategy and emerging policies for town centre uses. Community uses on the site are not precluded within the allocation.
R081/C393	Wimbledon Society	Site 28 P4 Lan adjoining Wimbledon Theatre	The loss of parking could be a significant issue for the well-being of this part of the Broadway: ADD therefore: "THE REQUIREMENT FOR SOME PUBLIC CAR PARKING TO SERVE THIS END OF THE BROADWAY IS TO BE ASSESSED PRIOR TO ANY SITE DISPOSAL".	It is considered that the existing wording within the site allocation has appropriate reference to the need to assess future parking demands on and around the site as a result of development.
R068/C232	Thames Water	Site 28 P4 Lan adjoining Wimbledon Theatre	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. Water supply infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a water supply strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the likely event of an upgrade to our assets being required, there could be a period of upto 3 years required for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian style planning condition to ensure the infrastructure is in place ahead of occupation of the development. On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."
R081/C394	Wimbledon Society	Site 31, Wimbledon Community Centre	"This COUNCIL-OWNED site HAS BEEN RECENTLY DEMOLISHED AND IS TO BE USED AS A TEMPORARY CAR PARK." It is important that this is said as the Council has a direct control over the future of the site as owner, not merely as a planning authority.	Partially agreed. Reference to the demolished building will be provided. The approved planning permission for temporary use as a car park is already referred to in the allocation.
R081/C395	Wimbledon Society	Site 31, Wimbledon Community Centre	As written, the open-ended nature of the list of potential uses allows for a future developer to select only those that are currently commercially attractive. The other uses, although listed, may simply never be provided. Accordingly it should be clearly stated that the allocated use should be: "THE PRINCIPAL USE SHOULD BE FOR COMMUNITY USE, AND ANY OTHER USE SHOULD BE ANCILLARY, UNLESS ALTERNATIVE COMMUNITY USE HAS ALREADY BEEN PROVIDED IN THE IMMEDIATE AREA." Given that the Council is the owner of the site, this can be a clear legal requirement when the time comes for the Council to dispose of the lease. Additionally this is a site that should be identified as a potential contributor to a town centre CHP scheme.	Not taken forward. The allocation does not preclude the type of development suggested within the representation. The site allocation provides for a range of uses which enables a degree of flexibility with regard to the future development of the site and the commercial viability of development given various constraints. Flexibility is provided with the allocation which is situated in Wimbledon town centre. This is consistent with town centre development and policies with the idea of creating a vibrant and viable town centre. It is also consistent with the NPPF 2012 to ensure a new development can be delivered on the site in accordance with existing and emerging policy. Emerging policy regarding combined heat and power scheme will govern how such services are provided.
R068/C233	Thames Water	Site 31, Wimbledon Community	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
		Centre		wastewater services."
R078/C286	Wimbledon Community Association	Site 31, Wimbledon Community Centre	<p>The Wimbledon Community Association (WCA) unfortunately had to relinquish its interest in the Wimbledon Community Centre in 28 St Georges Road (Site Proposal 31) to the Council in June this year as a consequence of the building falling into disrepair and the related financial difficulties which followed.</p> <p>The WCA is continuing as a body and has undertaken an initial survey of the current / former members and users at St Georges Road. Output from that is being used to help inform its future strategy and how best to apply the resources from the sale of the WCA 's interest at 28 St Georges Road.</p> <p>A key finding from the survey was that organisations wish to hire space in central Wimbledon but find it difficult to hire affordable accommodation, particularly larger spaces. Further research is to be carried out.</p> <p>A number of sites have previously been earmarked as potential locations for the WCA. The Merton Sites and Policies Plan has highlighted possible community use on a number of potential sites including the Library site (Site Proposal 16) – now no longer targeted for redevelopment, the 'P3 Site' (Site Proposal 01) and the 'P4 Site' (Site Proposal 28)</p> <p>The WCA is in discussion with various organisations, in particular the SWL YMCA (Site Proposal 62), with regard to helping meet that need.</p> <p>We will continue to develop our plans to support replacement facilities in central Wimbledon. We also wish to continue working with the Council to help meet those needs.</p> <p>The Council had a two thirds interest in the site at St Georges Road and we understand the site is to be used as a temporary car park following its demolition. In due course we feel it is important that the Council also uses its resources from its original two thirds interest in the site to help support replacement community facilities in Wimbledon.</p>	<p>Noted.</p> <p>Site 31: the comments provided relate to the current situation of WCA. This is not relevant to the site allocation, site 01: The site allocation includes community uses and therefore could be provided on the site, site 12: the site is proposed to be removed from the Sites and Policies Plan, site 16: the site is proposed to be removed from the Sites and Policies Plan, site 28: the site allocation includes community uses and therefore could be provided on the site, site 62: the site allocation includes community uses and therefore could be provided on the site.</p>
R015/C047a	Davey E	Site 31, Wimbledon Community Centre	<p>Wimbledon needs a purpose built community centre with flexible accommodation for large and small groups. It has excellent public transport links for the whole borough. I would therefore not like this site to be developed for commercial, financial or business use which includes offices, retail or a hotel. It should definitely stay in Council ownership for community use. This development could include council flats for key workers that should remain in council ownership and never be sold.</p>	<p>Not taken forward. The Wimbledon Community Centre was closed following consultation between the council and the Wimbledon Community Association who previously owned a third of the site. Whilst existing services have been accommodated in alternative locations the association is seeking a new premises as outlined in their representation. There are numerous existing sites available for such community uses in and surrounding Wimbledon town centre, as well as all the sites allocated in Wimbledon town centre including community uses in their allocation. The uses suggested in the representation are included in the allocation, however a greater range of flexibility is provided in order to ensure a viable and sustainable development will result. The council does not own housing stock anymore; the former council housing stock is owned by Merton Priory Homes.</p>
R068/C234	Thames Water	Site 32 Wyverne Youth Centre	<p>On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.</p>	<p>The text will be amended in accordance with the suggestion as follows:  <b>"Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."</b></p>
R068/C235	Thames Water	Site 33 Elm Nursery car park	<p>On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.</p>	<p>The text will be amended in accordance with the suggestion as follows:  <b>"Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."</b></p>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R045/C152	Mitcham Cricket Green Community and Heritage Group	Site 35 Mitcham fire station	<p>4. This is the most prominent and important site in Cricket Green and these buildings form part of a unique assemblage of buildings on an island site in the heart of the Conservation Area. Its future was a central part of the Tune In Cricket Green discussions and the Cricket Green Charter states that: "The island site – including the fire station and Cricketers – should be a focus of local community activity, and be developed and managed as a coherent whole" 5 We welcome the resounding rejection of the two recent appeals for demolition and redevelopment of the Cricketers pub for flats. It is notable that the Inspector's decision letter comments that: "There were also representations that a residential scheme would be at odds with the continuity of community use of both the appeal site and the other buildings in the group, an enclave in what is otherwise public open space and formerly common land. However, there appears to be no planning designation of this site for community use or policy barrier to the principle of its use for housing." (paragraph 29). 6. The fire station is also now at risk following the decision to vacate it for a new fire station near Mitcham tram stop and the Vestry Hall's fortunes fluctuate from year to year. 7. Consequently, we urge that this opportunity is taken to introduce a clear priority for local community and cultural uses on this site and to exclude residential development. This is the opportunity to address the future of the island site in a comprehensive way so that all three buildings are addressed together. We believe there are also opportunities to connect the three sites both physically and in the way they are used and managed which would bring important benefits to the area while respecting their individual character and overall contribution to the Conservation Area. We are therefore disappointed that the draft document only singles out the fire station site instead of addressing the whole area as an integrated whole. 8. In respect of the fire station we support community focused mixed use development but not for this to include a residential element</p>	<p>The council considers that the site has a number of restrictions to development based on the size, location, access, and local listing within the conservation area. The council has therefore adopted a flexible approach in consultation with the landowner to ensure that upon disposal of the fire station, it does not remain a vacant and unused building. The range of uses included in the site allocation reflects the desire for some creativity regarding the viability and deliverability of any redevelopment, with a number of community type uses enabled. It is likely that many uses may not require upper level floorspace, and accordingly residential use is considered suitable for the upper level. With regard to the site being grouped with adjoining properties, each site is in separate ownership with different proposals for the future. The adjoining public house already has been subject to several planning appeals and still a current application. It was originally suggested to be included in the Sites and Policies Plan, however it was not included as it was the subject of a live planning application. However, a range of cultural and community uses possible with the allocation. Vestry Hall is council owned however there is no intention to dispose or redevelop the site within the next 10 years. The inclusion of residential use has been suggested and there is no policy reason to preclude such use from existing on the site. If residential use is included in a mixed use development, it will provide occupants for 24 hours a day which will benefit community safety within the site and on the street.</p>
R005/C022	Bellamy J	Site 35 Mitcham fire station	<p>Future of Mitcham Fire Station Site: Page 267: the description of the Fire Station's surroundings on Lower Green West entirely omits any reference to the proximity of the War Memorial, a community memorial forming the venue for civic ceremonies. At a recent meeting of the Heritage and Design Working Group, it was confirmed that the War memorial (previously without any listed status, apparently due to decades of administrative oversight) would receive Local Listing as a matter of urgency in order to rationalise the situation.</p>	<p>Agreed. Reference to the nearby war memorial included in Site 35 Mitcham Fire Station in the "Site description" section. <i>Adjacent to the northwest of the site is a triangular area of open space known as Lower Green, which contains the war memorial"</i></p>
R068/C236	Thames Water	Site 35 Mitcham fire station	<p>On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.</p>	<p>The text will be amended in accordance with the suggestion as follows: <b>"Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."</b></p>
R037/C116b	London Fire and Emergency Planning Authority	Site 35 Mitcham fire station	<p>Our document dated 11th January 2013 did not provide any examples of the conversion of fire stations into community uses and art galleries. To the best of our knowledge there are no such cases. Please can you therefore amend the penultimate paragraph of the proposal</p>	<p>The penultimate paragraph will be removed from the plan as referred to in the Sites and Policies Plan.</p>
R037/C115	London Fire and Emergency Planning Authority	Site 35 Mitcham fire station	<p>We consider that the references to community uses is inappropriate due to a variety of reasons, including that such uses are unlikely to be viable or deliverable. We believe that the designation should be a residential-led scheme, incorporating mixed use development such as Retail (A1); Financial and Professional Services (A2); Restaurant or café (A3); Drinking Establishment (A4); Business Use (B1) and Health Uses (D1). Can you please confirm your agreement to our wording for the suggested use?</p>	<p>Not taken forward. The allocation includes all the uses suggested by the owners plus the addition of community uses such as a cinema, gallery or theatre (D2 use class) which was verbally discussed with the owners. The council considers such uses would be appropriate to the location, external and internal layout of the building and it also provides additional flexibility to redevelopment of the site, which accords to NPPF criteria. The allocation will therefore retain the ability for D2 uses to be established on the site. The council does not consider that the wording is required to specifically be a "residential led mixed use scheme" and believes the wording of the allocation can achieve this mix of uses regardless. The allocation is deliberately flexible to ensure a viable development can be delivered on the given the the tricky nature of the site such as its size, structural nature, and locally listed status within the conservation area. The wording is therefore considered appropriate and consistent with the suggestion made.</p>
R037/C116a	London Fire and Emergency Planning Authority	Site 35 Mitcham fire station	<p>We understand from previous discussions that there may be some particular alternative uses which you consider to be inappropriate for the site. If that is the case, can you please confirm a list of such uses, so that we can consider it with our client</p>	<p>It has been portrayed to the owner that the council would consider food retail uses to be inappropriate in this location.</p>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R037/C114	London Fire and Emergency Planning Authority	Site 35 Mitcham fire station	We write on behalf of our client, the London Fire And Emergency Planning Authority, in response to the Merton Sites And Policies Plan and Policies Map Pre-submission Publication Consultation, in respect of the above site. We have made representations during previous consultation periods in respect of this matter, most recently on 26th February and we comment further on the draft submission, as follows: We note that the reference to the Cricketers Public House has been updated, to reflect the recent dismissal of the two appeals. We consider that reference should also be made to the further application on the Cricketers for a residential conversion of the building, which we understand is to be decided by your planning committee in August.	Not taken forward. The reference to the appeals on the adjoining property were made solely to emphasise the importance of design in relation to any redevelopment of the site. Previous applications to demolish and build a new building on the adjoining site were refused at appeal solely on design related grounds. The current proposals for the site do not include significant exterior alterations and forms part of a change of use application. This is not considered relevant to the site allocation.
R068/C237	Thames Water	Site 36	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R077/C285	Whelan . P	Site 37 Wimbledon Greyhound Stadium	To whom it May concern, Wimbledon Greyhound stadium has served the community for many of years and for the good of all concerned, and has also brought in people from all over the globe. Wimbledon Greyhound Stadium is now the only stadium left In London, where families can travel and enjoy a great family night out without this family nights out family get together's will die just like in the way London has lost different venues throughout the years. I Myself A regular visitor to the stadium and travel to there from Kent and enjoy my evenings there. I submit this letter to save Wimbledon greyhound Stadium so that all people from London and all over the country can still bring our families and to enjoy the sport that we all love, and to keep the only London Greyhound Stadium In London where families can still meet and socialise at the same place without this families will drift apart.	The allocation does not promote the closure of the dog track or preclude the redevelopment of the site for an enhanced greyhound racing facility such as that proposed by one party. The council does not have a strategic policy with regard to retention of greyhound racing. Similarly, the GLA does not have strategic policy with regard to protection of greyhound racing in London.
R027/C095	GLA	Site 37 Wimbledon Greyhound Stadium	18. The GLA's previous issues concerning the potential loss of an active greyhound stadium use at the site remain and would raise strategic policy concerns regarding the protection of London's cultural heritage. The intensification of the site for uses that would support the continuation of the greyhound stadium would be supported, however, the provision of a substantial out of centre retail store as an enabling development at this site, would not be in conformity with London Plan policy.	Discussions with the GLA have taken place regarding their position with regard to the site allocation. The council's view is that the allocation will support a broad range of sporting activities, including greyhound racing, should this be deliverable on the site. The proposed allocation is sufficiently flexible to deliver different sports related proposals for the site while reinforcing that the site must principally deliver sporting activities. We believe that this approach is in line with the spirit of the NPPF and will enable the delivery of significant new sporting facilities in south London, recognising Merton's long sporting heritage and role as an olympic borough. With regard to a substantial out of centre retail store, depending on the scale of sporting intensification proposed, the council acknowledges that enabling development may be proposed on the site. The allocation states that any enabling development will be "subject to meeting planning policy, evidence and consultation." The council shares the concerns of the GLA regarding significant out of centre retail development as the council holds a similar town centre first policy position. This requirement would be paramount for any out of centre retail use proposed as referred to by the GLA. Such development would be subject to Merton's local plan (Core Strategy and emerging policy) as well as the London Plan and NPPF 2012. The allocation is therefore considered to be in accordance with London Plan policy as it is clearly states that any enabling development would be subject to meeting relevant policy. The allocation is considered to accord with the suggestions made by the GLA.
R086/C383	GRA Ltd and AFC Wimbledon	Site 37 Wimbledon Greyhound Stadium	A revised proposal was submitted on behalf of the majority landowner and AFC Wimbledon for a redevelopment of the stadium site. The proposal included details redevelopment which would incorporate a new 11,000 seat stadium for AFC Wimbledon (capable of expansion to 20,000 seats), circa 600 residential units, a new squash and fitness club of circa 1,000m2, a new retail store of circa 1,000m2, appropriate car and cycle parking (circa 350 spaces), servicing arrangements and landscaping. The representation also contained a substantial amount of information regarding the history of the site and the club, site selection and the level of work and investigation undertaken to date. The supporting documents submitted included; a business plan prepared by AFC Wimbledon, a masterplan design report, masterplan drawings, a stadium proposal report, a transport and highways technical note, and a flood risk and drainage technical note.	The representation and supporting information was acknowledged. No action is needed as the information supports the allocation in its current form.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R064/C202	Stockwell D	Site 37 Wimbledon Greyhound Stadium	Access It would be helpful if any redevelopment of the site could enable improved access to Wimbledon Park tube station and the River Wandle from Summerstown/south Earlsfield.	This site is already a noteworthy leisure/sporting venue and this has consequently been identified for intensification of sporting activity.  The existing uses already attract a considerable number of patrons and any proposal expected to attract a high level of trips would be subject to a comprehensive transport assessment so that its potential impacts on existing infrastructure can be fully assessed. Where major issues are identified, appropriate mitigation measures would need to be put in place to demonstrate that the impacts can be safety managed.  The scope and outcome of this assessment would be considered jointly with the London Borough of Wandsworth and TfL to ensure that a consistent and joined up approach is followed. This would include agreeing the nature of any intervention required. Depending on the nature and scale of development proposals may also be subject to scrutiny and approval by the Mayor for London.
R080/C291	Wimbledon Park Residents Association	Site 37 Wimbledon Greyhound Stadium	As far we are aware, even at this late stage the owner of the land, GRA Ltd has yet to put forward any detailed plans for the building of a football stadium and enabling developments. Similarly no evidence has been submitted to suggest that Wimbledon AFC possess the financial resources to run such a stadium even if it is built. We note that this is not the case for Hume Consulting Ltd who have proposed detailed plans for a new greyhound stadium and have stated that they have the required financial resources.	An updated proposal was submitted by the GRA as part of the pre-submission consultation with more refined information regarding their position.
R031/C102	Hume Consulting (around 5000 supporting signatures)	Site 37 Wimbledon Greyhound Stadium	As regards the ownership of Site 37, Wimbledon Greyhound Stadium, if Hume Consulting's proposal is favoured by the Council we shall protect an historic public amenity, namely Greyhound racing, for the people of London. In planning terms, Greyhound racing is an amenity which has taken place at the Plough Lane Site since 1928 and is under threat from all other proposals. Subject to the favourable consideration of our proposal to protect and develop Greyhound racing, our consortium is ready and willing to pay market value for Wimbledon Greyhound Track.	The comments clarify the viability of the site for the submitter. Presently they are not the owner but have submitted a proposal to develop the site, subject to acquisition.
R064/C203	Stockwell D	Site 37 Wimbledon Greyhound Stadium	Flood risk Any development of the site needs to be compatible with the flood risk to the site and not increase the flood risk to other neighbouring properties.	This requirement is clearly stated within the site allocation and noted within local and national planning policy.
R031/C101	Hume Consulting (around 5000 supporting signatures)	Site 37 Wimbledon Greyhound Stadium	Further to your letter dated the 23rd July 2013, please refer to the statement below from Hume Consulting Ltd in relation to the issue of land ownership at Wimbledon Greyhound Stadium, Plough Lane. In addition, we also enclose a copy of a petition with almost 5000 names of people in support of Hume Consulting's proposal to retain greyhound racing at Wimbledon. This petition is growing in numbers daily and goes to show the support our client has in relation to their proposals.	Support for the allocation, specifically greyhound racing on the site.
R029/C099	Graham RS	Site 37 Wimbledon Greyhound Stadium	I am writing to you concerning Wimbledon Stadium. What we don't want is more football. There is enough in London for everyone. What we do want is our speedway as promised by the Mayor of Merton on our last day of speedway.	The site is allocated for sporting intensification. It is not conclusive that the site will be used for football. Speedway use would not be precluded on the site. Council has considered numerous potential uses for the site and based on research and evidence available, sporting intensification is deemed the most suitable. The site allocation does not preclude a multi-use stadium similar to that which exists for example. Site specific uses and subsequent conditions will be determined as part of any planning application submitted for the site regarding the use of the site.
R064/C198	Stockwell D	Site 37 Wimbledon Greyhound Stadium	I emailed Merton Council in March 2013 as I did not feel that sufficient effort had been made to engage the residents of Summerstown, SW17 regarding the possible redevelopment of the Wimbledon Greyhound Stadium site, and that we had not been notified that a consultation was taking place. I was invited to submit comments after the consultation closed; please see these below. Whilst I understand that the planning permission process is some way off, I do not agree that Merton Council has sufficiently informed or engaged the local community at this point in time, particularly as we are Wandsworth rather than Merton residents. It is not sufficient to notify residents through Wimbledon media sources, when the residents most affected do not live there. Many of my neighbours are not aware of the potential for redevelopment of the site. Merton Council needs to take proactive steps to engage the community and take their views in to consideration.	The consultation methods undertaken were in accordance with local and national planning guidance. In addition, Merton Council undertook targeted leaflet drops around some sites, including the Wimbledon Greyhound Stadium site, which incorporated the area referred to in the representation. This is not a relevant consideration with regard to the site allocation.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R063/C197	Stephenson R	Site 37 Wimbledon Greyhound Stadium	I understand that a proposal has been made by Paschal Taggart for Wimbledon Stadium to be developed as a family-friendly, multi-sport arena, centring on greyhound racing and, we hope, speedway racing. Given that when this stadium was first built in the late 1920s it was specifically for these two sports, and that it is now the only location in the Greater London area where they can both be pursued, I would like to give my support to this proposal. I live in Sunbury on Thames, a few miles from Wimbledon and, as supporters of "The Dons" my family and I used regularly to travel to Wimbledon to watch the speedway racing there until it ceased in 2005. If it were to resume there then we would gladly come again to Wimbledon for this purpose as regular supporters of the Home Team	The representation outlines support for one of the proposals made which accords with the site allocation. The representation is therefore considered to support the allocation, albeit indirectly.
R031/C105	Hume Consulting (around 5000 supporting signatures)	Site 37 Wimbledon Greyhound Stadium	It is the widely held belief within the Greyhound industry and beyond, that Wimbledon Greyhound Stadium and the surrounding buildings on the site, have been purposely run down since the date of purchase in 2005 as a concerted effort to discontinue Greyhound racing at the site, in order to maximise the market value for ultimately residential/mixed use. This has already occurred at Oxford Greyhound Stadium, however, Oxford Council have made it public that they intend to object to the proposed residential planning application.	This is not relevant to the site allocation.
R049/C158b	National Grid	Site 37 Wimbledon Greyhound Stadium	National Grid appreciates the consideration of issues highlighted in our previous consultation in relation to sites 37, 50, 59, 75 and 78. We note that site 50 appears to have been omitted from the Submission Plan, if this is not the case please advise.	Support for the allocation and wording. No action needed.
R080/C290	Wimbledon Park Residents Association	Site 37 Wimbledon Greyhound Stadium	One can only conclude that the proposal is designed to satisfy the political aims of the group which currently controls Merton Council. At the the full council meeting on 10th June 2013, at which Merton's Sites and Policies Document was debated, before it was submitted to the Secretary of State, a motion to take into account our objections in relation to site 37 was put forward. However, this was defeated by 29 to 23 votes with 5 no votes and so we can conclude that the proposed use for site 37 has only a small majority in favour even amongst Merton's councillors and this situation could easily change after the local elections next year.	The allocated use for the site has been determined by a range of research and evidence available to the council and considered a range of uses considered possible on the site. This consultation was of course undertaken in conjunction with the landowner, who ultimately controls the site and submitted the site for inclusion in the Sites and Policies Plan. Following submission of the site, a range of council's preferred uses were considered, and based on research and evidence, sporting intensification was considered the most appropriate from a strategic policy perspective. The representation stated that alternative uses such as a business park (or similar development) have not been promoted by any party and are considered unlikely to be viable on the site. Other uses suggested such as a park or tennis courts are also unlikely to be viable given the size and location of the site and remedial action required to bring the site into such use. The allocation is based on the best available information from a range of sources as well as considering key criteria such as the availability and viability of any redevelopment on the site. It has been demonstrated that viable developments exist which can deliver the site, subject to meeting policy, evidence and consultation. It is also noted that the site is identified in Merton's Core Strategy whereby the document also states the council's support for AFC Wimbledon to return to the borough and the site being considered as such.
R031/C106	Hume Consulting (around 5000 supporting signatures)	Site 37 Wimbledon Greyhound Stadium	Our plans will deliver a world class stadium, squash club, 400 apartments and approximately 450 car parking spaces for the nearby NHS Hospital. We have the track record to deliver this scale of development, but also crucially in running and operating greyhound stadiums, the like of which Wimbledon could be proud of" (Hume Consulting Ltd, 26th August 2013)	The comments regarding the development proposal are acknowledged.
R062/C194	Sport England	Site 37 Wimbledon Greyhound Stadium	Planning Policy Objective 6 within Sport England's Spatial Planning for Sport and Active Recreation: Development Control Guidance Note (2009) Appendix ( <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/</a> ), aims to ensure that there is no further reduction in the supply of conveniently located, quality playing fields for sport to satisfy current and likely future demand. Sport England will normally oppose development that would lead to the loss of, or prejudice the use of, all or part of a playing field, without meeting at least one of the specific exception criteria identified in Sport England's policy 'A Sporting Future for the Playing Fields of England' (1997), a copy of which can be downloaded from our website at <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</a> . The following sites include (or potentially include) existing sports facilities:  • Wimbledon YMCA	The site is allocated for sporting intensification. The site therefore promotes a net increase in sporting use on the site. No reduction or loss of sporting use is proposed by the allocation. The representation supports an increase in sporting uses therefore is considered to support the allocation.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			<ul style="list-style-type: none"> <li>Wimbledon Greyhound Stadium</li> <li>Southey Bowling Club</li> </ul>	
R064/C200	Stockwell D	Site 37 Wimbledon Greyhound Stadium	Residential development Any residential development of this area needs to be supported by the necessary local infrastructure. The traffic is already at standstill in rush hour on Garratt Lane and Earlsfield Station is at capacity, with people often waiting for several trains before being able to board.	The allocation states that any enabling development would be subject to meeting relevant policy, evidence and consultation. This would include necessary local infrastructure, of which transportation is a primary component. It is considered that the allocation appropriately addresses the concerns raised. Further detail will be assessed as part of the planning application process once the scale, form and type of development is known.
R064/C201	Stockwell D	Site 37 Wimbledon Greyhound Stadium	Retail use One of the use suggestions includes a substantial retail store. I would question the need for another retail development given the proximity of Colliers Wood retail parks, Southside and the redevelopment of the Springfield Hospital site. Further retail facilities are not in demand from local residents and it would significantly increase traffic from other areas. It would also not be compatible with the broader policy relating to out of town development	The allocation states that any enabling development would be subject to meeting relevant policy, evidence and consultation. It should be emphasised that this is a use suggested within one of the proposals submitted for the site and is not one of the allocated uses. It is considered that the allocation appropriately addresses the concerns raised. Further detail will be assessed as part of the planning application process once the scale, form and type of development is known.
R080/C289	Wimbledon Park Residents Association	Site 37 Wimbledon Greyhound Stadium	The final description of site 37, site 38 in adopted document, in the Merton's "Sites and Policies DPD", submitted to the Secretary of State, is largely the same as the draft of stage 3 (January 2013). As a result our previous objections are still valid and we have included them below. We have made some very minor changes to clarify which of our responses correspond to which stage of the process. Merton Council has proposed a development for site 37 that is incompatible with its own planning guidelines contained in "Core Planning Strategy 2010" which is in turn is based on the "National Planning Policy Framework document". We note that it differs substantially from the first draft of the Sites and Policies DPD (stage 2, January 2012) which compared to the extreme position taken at stages 3 and 4 gives a much more measured proposal for site 37. This change is despite the representations that have been made to Merton Council by the Wimbledon Park Residents Association. Site 37 is a very difficult site to redevelop and if planning considerations are not followed there is considerable scope for a development that could blight Wimbledon town centre, the shops on Arthur Road and residential areas in the vicinity of the proposed stadium.	The council's position has not changed in relation to the allocated use for the site since Stage 2a consultation. Several proposals for redevelopment of the site have been submitted by various parties. The council has not allocated the site for any specific proposal submitted due to the range of uses proposed being subject to meeting existing and emerging policy. Regeneration of the site is referred to within the Core Planning Strategy. It is acknowledged that numerous constraints exist to redevelop the site, which is referred to within the allocation. Any substantial redevelopment of the site will have to have regard to any potential impacts on Wimbledon town centre, Arthur Road and residential areas in the vicinity of the stadium. It is considered that this is adequately referred to within the allocation.
R086/C384	GRA Ltd and AFC Wimbledon	Site 37 Wimbledon Greyhound Stadium	The representation included information to support the proposal such as a transport brief, a flood risk brief, a masterplan for the site, a business plan and and economic study.	The receipt of the information is acknowledged. No action is needed as the information supports the allocation.
R061/C191a	Snell J	Site 37 Wimbledon Greyhound Stadium	The second proposal I would like to comment on is Wimbledon Greyhound Stadium. I would love to see AFC Wimbledon have a ground there - if possible retaining greyhound racing.	The use of the site for football and/or greyhound racing are considered to be in general accordance with the allocation. The comments are therefore considered to be support for redevelopment of the site for sporting intensification.
R031/C104	Hume Consulting (around 5000 supporting signatures)	Site 37 Wimbledon Greyhound Stadium	The site is currently owned by GRA Limited, which was acquired by Risk Capital Partners in 2005. It has since emerged that the well known house builders, Gaillard Homes, are partners of Risk Capital Partners and participated in the 2005 purchase. Irish Nationwide Building Society provided in excess of £50m to assist with the 2005 purchase, and this debt has now been transferred to the National Asset Management Agency ("NAMA") in Ireland. NAMA will not undertake the long term financing of a £100m mixed use scheme, with their stated aim to dispose of sites in general at market value upon receipt of planning.	This is not a relevant planning policy consideration.
R074/C281	Wallace .S	Site 37 Wimbledon Greyhound Stadium	The Wimbledon Stadium site could well be developed as a football stadium for AFC Wimbledon use but there would be a need to improve local amenities and transport links	General support for the allocation. The allocation acknowledges that improvements to local amenities and transport links will be required if such a scale of development occurred.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R064/C199	Stockwell D	Site 37 Wimbledon Greyhound Stadium	<p>Traffic/noise impacts</p> <p>In terms of redeveloping the site, whether purely for residential use or for a football/greyhound stadium/retail, my most significant concern is the impact of increased traffic and noise. The local public transport and road infrastructure are not sufficient to cope with an increase in the number of people using/living on the site.</p> <p>Whilst additional bus services and significant improvement of Summerstown road between Wimbledon Road and Garratt Lane, might enable some residential use of the site, the local area simply could not cope with the additional traffic and public transport requirements of a 10,000 – 15,000 football stadium. The section of Garratt Lane between Wimbledon Road and Summerstown would become unusable when football games are on. Both the volume of traffic and pedestrians that a football stadium of this scale would bring, as well as the use of the venue itself, would significantly increase the noise in the local area at weekends and on weekday evenings when games take place. Any development of this scale would therefore significantly affect the quality of life of local residents, particularly those who live on Garratt Lane.</p>	<p>This site is already a noteworthy leisure/sporting venue and this has consequently been identified for intensification of sporting activity.</p> <p>The existing uses already attract a considerable number of patrons and any proposal expected to attract a high level of trips would be subject to a comprehensive transport assessment so that its potential impacts on existing infrastructure can be fully assessed. Where major issues are identified, appropriate mitigation measures would need to be put in place to demonstrate that the impacts can be safely managed.</p> <p>The scope and outcome of this assessment would be considered jointly with the London Borough of Wandsworth and TfL to ensure that a consistent and joined up approach is followed. This would include agreeing the nature of any intervention required. Depending on the nature and scale of development proposals may also be subject to scrutiny and approval by the Mayor for London. It is considered that the allocation adequately states the requirement to manage potential traffic impacts generated on the site.</p>
R073/C277	Waitrose	Site 37 Wimbledon Greyhound Stadium	<p>Waitrose's previous comments submitted in respect of Stage 3 and Stage 2A Consultations remain valid and should be read in conjunction with this representation.</p> <p>We support that the current proposed allocation which no longer promotes the site for a retail foodstore. This is appropriate given the out-of-centre location of the Site in retail policy terms. We reiterate that the Plan should not be seen to be promoting such development where there is no identified need, a sequential assessment has not been undertaken and the Town Centre impact effects of the scheme have not been assessed.</p> <p>Waitrose recommends that within the proposed allocation for development of 'the intensification of sporting activity (Class D2 Use) with enabling development' should explicitly require any planning application for retail development to satisfy the retail planning policy tests included within Core Strategy Policy CS7 and emerging Sites and Policies Plan Policy DM R2. This is to ensure there is no ambiguity and that both the sequential test and impact assessments are carried out for any Town Centre uses in accordance with the National Planning Policy Framework (Paragraphs 24 and 26). This inclusion will ensure the Plan is 'sound' in accordance with the National Planning Policy Framework (Paragraph 182).</p> <p>It is therefore requested that the following wording be incorporated into any site specific policy</p>	<p>Not taken forward. The council is not allocating the Wimbledon greyhound stadium for retail development. Site proposals must be assessed against policies in Merton's Local Plan.</p>
R080/C293	Wimbledon Park Residents Association	Site 37 Wimbledon Greyhound Stadium	<p>We have carried out surveys in the streets affected by the redevelopment of site 37 and found that although some residents were aware of the occasional articles in the local papers that there was a possibility of redevelopment of the Greyhound stadium, out of 33 households surveyed none were aware that Merton was carrying out a consultation exercise for site 37 to which they could contribute if they wished. As a result we find that Merton Council has failed to carry out the required consultation.</p> <p>We rely on the independent Planning Inspector to apply proper planning considerations when evaluating the proposal of Merton council for site 37.</p>	<p>Consultation was undertaken in accordance with statutory requirements for plan making. In addition, leaflets regarding Merton's Sites and Policies Plans and the Wimbledon greyhound stadium site were delivered to all premises within a 500 m radius of the site to ensure coverage of the consultation (Stage 3). It is therefore considered that the council has undertaken appropriate and necessary consultation with regard to development of the Sites and Policies Plan.</p>
R068/C238	Thames Water	Site 37 Wimbledon Greyhound Stadium	<p>We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. Water supply infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a water supply strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the likely event of an upgrade to our assets being required, there could be a period of up to 3 years required for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian style planning condition to ensure the infrastructure is in place ahead of occupation of the development. We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. Drainage Infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in</p>	<p>The text will be amended in accordance with the suggestion as follows:</p> <p><b>"Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."</b></p>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			place ahead of occupation of the development.	
<b>R080/C292</b>	Wimbledon Park Residents Association	Site 37 Wimbledon Greyhound Stadium	We now briefly discuss the changes at stage 4 to the description of site 37 compared to the draft at stage 3 (January 2013) . Apart from giving a more complete description of the current activities on site 37, our suggestion of relocating developments from other sites to site 37 and use the more suitable sites vacated to build residential property, a school or other such needed developments is included, but then ignored. There is also a paragraph stating that "residential development would be expected to deliver the necessary school places, health care and other associated infrastructure". Given the difficult nature of site 37 and that the residential development is already an enabling development, for example for a football stadium, it is unclear if the development could provide for infrastructure of the required magnitude. It is also not stated where in Merton this new infra structure would be located.	The site description was updated to ensure it was accurate and referred to all uses and buildings on the site as some small operations were inadvertently left out. No evidence was submitted to support the representation regarding the delivery of such a proposal to provide alternative uses on the site. Any residential development on the site would be subject to relevant s106/CIL charges which will take into account necessary mitigation measures to offset the increase in demand on local infrastructure such as schools and medical services. With regard to transportation infrastructure, no changes are required. This site is already a noteworthy leisure/sporting venue and this has consequently been identified for intensification of sporting activity. The existing uses already attract a considerable number of patrons and any proposal expected to attract a high level of trips would be subject to a comprehensive transport assessment so that its potential impacts on existing infrastructure can be fully assessed. Where major issues are identified, appropriate mitigation measures would need to be put in place to demonstrate that the impacts can be safety managed. The scope and outcome of this assessment would be considered jointly with the London Borough of Wandsworth and TfL to ensure that a consistent and joined up approach is followed. This would include agreeing the nature of any intervention required. Depending on the nature and scale of development proposals may also be subject to scrutiny and approval by the Mayor for London.
<b>R080/C292</b>	Wimbledon Park Residents Association	Site 37 Wimbledon Greyhound Stadium	We now briefly discuss the changes at stage 4 to the description of site 37 compared to the draft at stage 3 (January 2013) . Apart from giving a more complete description of the current activities on site 37, our suggestion of relocating developments from other sites to site 37 and use the more suitable sites vacated to build residential property, a school or other such needed developments is included, but then ignored. There is also a paragraph stating that "residential development would be expected to deliver the necessary school places, health care and other associated infrastructure". Given the difficult nature of site 37 and that the residential development is already an enabling development, for example for a football stadium, it is unclear if the development could provide for infrastructure of the required magnitude. It is also not stated where in Merton this new infra structure would be located.	No changes required. This site is already a noteworthy leisure/sporting venue and this has consequently been identified for intensification of sporting activity. The existing uses already attract a considerable number of patrons and any proposal expected to attract a high level of trips would be subject to a comprehensive transport assessment so that its potential impacts on existing infrastructure can be fully assessed. Where major issues are identified, appropriate mitigation measures would need to be put in place to demonstrate that the impacts can be safety managed. The scope and outcome of this assessment would be considered jointly with the London Borough of Wandsworth and TfL to ensure that a consistent and joined up approach is followed. This would include agreeing the nature of any intervention required. Depending on the nature and scale of development proposals may also be subject to scrutiny and approval by the Mayor for London.
<b>R075/C282</b>	Walsh R	Site 37 Wimbledon Greyhound Stadium	While I don't think Wimbledon Dog Track would fall under your constituency it is just around the corner from me and I am writing to ask whether you could bring any influence you could to try to stop the closure of the Dog track. It is the last remaining dog track in London and to lose it would be a shame, it is a very good night out and I have had many nice nights there.	The Wimbledon Greyhound Stadium site is situated within the London Borough of Merton and borders the adjoining London Borough of Wandsworth. The allocation does not promote the closure of the dog track or preclude the redevelopment of the site for an enhanced greyhound racing facility. The council does not have a strategic policy with regard to retention of greyhound racing in the borough. Similarly, the GLA does not have strategic policy with regard to protection of greyhound racing in London.
<b>R031/C103</b>	Hume Consulting (around 5000 supporting signatures)	Site 37 Wimbledon Greyhound Stadium	Whilst our consortium does not currently own the Wimbledon Greyhound Stadium site, we have submitted our proposed plans and supporting reports in good faith to comply with the "Call for Submissions" by Merton Council. We have done this in an effort to retain Greyhound racing at what is now the last such stadium in the capital city - all other sites have been closed and used purely for residential purposes. It is the belief within the greyhound industry that the loss of the most iconic stadium in the world would lead to a terminal decline in the wider Greyhound industry across the UK and Ireland, with the loss of upwards of 10,000 jobs.	The comments clarify the viability of the site for the submitter. Presently they are not the owner but have submitted a proposal to develop the site, subject to acquisition.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R081/C347	Wimbledon Society	Site 37 Wimbledon Greyhound Stadium	<p>Wimbledon Greyhound Stadium: site 37: pages 330 &amp; 348: page A 6 ADD to the Issues section, paragraph 4: " arrangements require careful scrutiny/improvement. ANY DEVELOPMENT FOR SPORTING ACTIVITY MUST BE ACCOMPANIED BY AN IMPROVED PEDESTRIAN/CYCLE ACCESS ROUTE LINKING TO EARLSFIELD STATION."</p> <p>Noting that parts of this enhanced route would lie within the LB of Wandsworth, but the improvement would be important as Earlsfield is the closest main line Station to the site, and there are also bus routes through Garratt Lane. Concerning the reference to "more viable uses": (page 349): The introduction of a large foodstore, or of any use that would detract from the economy of nearby Local or Town Centres should not be considered.</p>	<p>This site is already a noteworthy leisure/sporting venue and this has consequently been identified for intensification of sporting activity.</p> <p>The existing uses already attract a considerable number of patrons and any proposal expected to attract a high level of trips would be subject to a comprehensive transport assessment so that its potential impacts on existing infrastructure can be fully assessed. Where major issues are identified, appropriate mitigation measures would need to be put in place to demonstrate that the impacts can be safety managed.</p> <p>The scope and outcome of this assessment would be considered jointly with the London Borough of Wandsworth and TfL to ensure that a consistent and joined up approach is followed. This would include agreeing the nature of any intervention required. Depending on the nature and scale of development proposals may also be subject to scrutiny and approval by the Mayor for London.</p>
R048/C157	Murray B	Site 41 Kingston Road / Lower Downs Road	As a resident in Lower downs road,I am concerned about this development.I can see the club wants to guarantee its future however what about access in to the site ,parking is also a concern,how many houses do they plan. Are there any plans that can be looked at.	The number of units proposed is currently unknown and no plans regarding development have been submitted to the council. The council considers that only a small number of units are possible on the site given the constraints such as size, shape, proximity to adjoining properties and the retention of the bowling club with a desired enhanced clubhouse (by the owners) on the site. Council officers consider that suitable residential access can be provided to the site which will not have a material or significant measurable effect on the surrounding road network. Parking demand will be assessed at the time a planning application is submitted.
R081/C348	Wimbledon Society	Site 41 Kingston Road / Lower Downs Road	Kingston Road/Lower Downs Road: site 41: page 314: The intersection of four roads, together with a significant pedestrian/school children crossing load could possibly be improved by a small amount of road widening at the frontage of this site. This possibility should therefore be mentioned in the "Issues" section as a design element to be considered in the overall layout.	The site allocation contains appropriate reference to transportation matters required to be addressed in order to deliver the site. Should a planning application come forward then access issues will require careful scrutiny.
R068/C239	Thames Water	Site 41 Kingston Road / Lower Downs Road	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R081/C396	Wimbledon Society	Site 41 Kingston Road / Lower Downs Road	The intersection of four roads, together with a significant pedestrian/school children crossing load could possibly be improved by a small amount of road widening at the frontage of this site. This possibility should therefore be mentioned in the "Issues" section as a design element to be considered in the overall layout.	Not taken forward. The council has obtained data from the Metropolitan Police Service which illustrated that there had been one injury causing accident at the intersection in the last five years. Pedestrians are currently afforded a signalled crossing at the intersection. The allocation has outlined numerous traffic related matters that will need to be addressed during the planning application phase of development. If land is required for any intersection improvements this will be able to be addressed at that point in time, once sufficient information is available. Presently there is no information to suggest such measures are required or needed to be allocated.
R068/C240	Thames Water	Site 46 The Old Lamp Works, High Path	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R025/C076	Friends Life Limited	Site 48 Bushey Road	<p>a) Background: Friends Life Limited have previously submitted representations in respect of their landholding at 80 Bushey Road which is currently occupied by Pets at Home and Topps Tiles, and is therefore in established retail use. The site is not identified as forming part of a specific proposal in the Stage 3 draft DPD, but it did form part of Site Proposal 48 in the Stage 2 Consultation. The land was removed following representations which indicated that the site would not be available for redevelopment until 2023. However, this position was clarified in our representations to the Stage 3 consultation in February 2013, which advised the following: "The existing building at 80 Bushey Road is a first generation retail warehouse which is now dated, tired and beyond refurbishment. Having begun life as a DIY store in the 1980s it is poorly configured, with subdivision having occurred more recently following a sublet to Topps Tiles. It does not lend itself well to future subdivision and the servicing is poor. It is therefore no longer fit for purpose and does not meet the needs of modern day retailing. In short, the site is operationally inefficient and ripe for redevelopment. Any redevelopment of the site would need to maintain existing use values for obvious commercial reasons. Moreover and notwithstanding previous representations by other parties, there is a redevelopment break clause in the current lease at 2015, which can be exercised on redevelopment grounds. However, any redevelopment would need to provide for the relocation of Pets at Home on market terms.FLL's redevelopment aspirations are centred on an enhancement and expansion of the existing retail asset in terms of providing high quality retail accommodation that meets the needs of modern day retailers. The site is an established and successful retail destination and market signals suggest that there is a strong need for additional retail floorspace in this location to support the needs of a growing population. Any redevelopment of the site would seek to provide a redominantly bulky goods retail scheme for which there is clear demand. The principle of such a redevelopment would be acceptable given the site's established retail use. There are also clear benefits associated with a qualitatively enhanced retail offer with the current site being substandard and inefficient in that respect and the immediate wider area to the west of 80 Bushey Road would be brought into the redevelopment plans should that site come under FLL's ownership. FLL's aspirations should not be prejudiced by the Plan making process and the immediate wider area to the west of 80 Bushey Road would be brought into the redevelopment plans should that site come under FLL's ownership." This remains the case, but since these representations Friends Life Limited have unconditionally acquired the freehold interest in 84-86 Bushey Road, as clarified below.</p>	The site at 80 Bushey Road was removed from consideration in the Sites and Policies Plan prior to the Stage 3 consultation based on information provided by the owners representative based on two reasons. Firstly, that the existing occupier had a long lease in place until at least 2022 therefore it was highly unlikely that any redevelopment of the site could be delivered, and secondly that only an expansion of the existing A1 use class offer was desired. Such an expansion of an existing use does not require a strategic allocation and the site was not available for delivery within the lifetime of the plan. It was only following Stage 3 consultation that the position changed as stated by the owners representative, however only an expansion of existing retail use was desired therefore the site at 80 Bushey Road was not reinstated to the plan.
R025/C077	Friends Life Limited	Site 48 Bushey Road	<p>b) Clarification of Land Ownerships: As the Council is aware, Friends Life Limited (FLL) own the freehold of 80 Bushey Road. FLL is a fund managed by AXA Real Estate. There is also one leasehold interest, Pets at Home, with Topps Tiles subletting. As mentioned, there is a redevelopment break clause in the current lease at 2015. Friends Life Limited (FLL) now also owns the freehold interest in 84-86 Bushey Road (formerly owned by Ignis Asset Management Limited). FLL's interest was acquired on 11 July 2013 so this is a very recent acquisition for the fund. 88 Bushey Road is also managed by AXA Real Estate, but the land is owned by a different fund (Friends Life Assurance Society Limited). 80-86 Bushey Road and 88 Bushey Road are therefore in two separate ownerships with different beneficiaries and strategies. The only common ground is that the sites are both managed by AXA Real Estate, which is a global investment management company.</p>	The comments regarding the land ownership on the site are acknowledged and the text in the allocation amended accordingly.
R025/C077	Friends Life Limited	Site 48 Bushey Road	<p>b) Clarification of Land Ownerships: As the Council is aware, Friends Life Limited (FLL) own the freehold of 80 Bushey Road. FLL is a fund managed by AXA Real Estate. There is also one leasehold interest, Pets at Home, with Topps Tiles subletting. As mentioned, there is a redevelopment break clause in the current lease at 2015. Friends Life Limited (FLL) now also owns the freehold interest in 84-86 Bushey Road (formerly owned by Ignis Asset Management Limited). FLL's interest was acquired on 11 July 2013 so this is a very recent acquisition for the fund. 88 Bushey Road is also managed by AXA Real Estate, but the land is owned by a different fund (Friends Life Assurance Society Limited). 80-86 Bushey Road and 88 Bushey Road are therefore in two separate ownerships with different beneficiaries and strategies. The only common ground is that the sites are both managed by AXA Real Estate, which is a global investment management company.</p>	The comments regarding the land ownership on the site are acknowledged and the text in the allocation amended accordingly.
R025/C078	Friends Life Limited	Site 48 Bushey Road	<p>c) Observations:Whilst FLL are currently considering their options, it is clear from market conditions that the demand for strict B-class employment uses on the site is extremely weak. This is evidenced by widespread vacancies across both 84-86 and 88 Bushey Road with all but two buildings at the rear of 88 Bushey Road currently occupied. It is also a point that has been recognised by the Council in the emerging DPD: "Marketing of both parts of the site has shown little to no interest in retaining the current office/light industrial use for the vacant areas of the site." The majority of the allocated Local Significant Industrial Site (LSIS) is therefore vacant and has been so for in excess of 4 years. It is also clear that, notwithstanding the wider sites current allocation, it is not and has not, for some period of time, performed a function that is consistent with its Core Strategy LSIS designation. Representations submitted to date by parties representing land ownerships at 84-88 Bushey Road have all concluded that no demand exists for the sites as</p>	Sufficient information has been provided to the council regarding the demand for strictly B class uses on the site, which evidence suggests is limited. This has prompted the inclusion of the site in the Sites and Policies Plan for alternative uses. The site is identified as a LSIS and this forms the basis for allocating the site for an employment led regeneration of the site. The council therefore acknowledges that alternative uses can be accommodated on the site as a result. It is not considered appropriate that the site should be excluded from providing employment led uses as it is a LSIS as outlined in the Core Strategy as well as considered a "good location"

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			either an office location (the predominant existing use) or indeed an industrial location. This consensus has been established through extensive marketing for the numerous vacant buildings within the LSIS designation. In light of this position, namely that there is no demand for strict employment uses in this location, the promotion of alternative uses that retain the employment-generating history of the sites seems entirely appropriate. However, it is questionable, given market conditions, both past and present, whether the promotion of an 'employment-led mixed use scheme', as envisaged in the latest consultation draft of the Site and Policies DPD, is realistic or indeed deliverable.	in Merton's Employment and Economic Land Study 2010. The site is therefore allocated for employment led regeneration in line with these two documents, however a range of alternative uses is provided in the allocation. The council's position is considered to be in general accordance with these comments made.
<b>R025/C078</b>	Friends Life Limited	Site 48 Bushey Road	c) Observations:Whilst FLL are currently considering their options, it is clear from market conditions that the demand for strict B-class employment uses on the site is extremely weak. This is evidenced by widespread vacancies across both 84-86 and 88 Bushey Road with all but two buildings at the rear of 88 Bushey Road currently occupied. It is also a point that has been recognised by the Council in the emerging DPD: "Marketing of both parts of the site has shown little to no interest in retaining the current office/light industrial use for the vacant areas of the site." The majority of the allocated Local Significant Industrial Site (LSIS) is therefore vacant and has been so for in excess of 4 years. It is also clear that, notwithstanding the wider sites current allocation, it is not and has not, for some period of time, performed a function that is consistent with its Core Strategy LSIS designation. Representations submitted to date by parties representing land ownerships at 84-88 Bushey Road have all concluded that no demand exists for the sites as either an office location (the predominant existing use) or indeed an industrial location. This consensus has been established through extensive marketing for the numerous vacant buildings within the LSIS designation. In light of this position, namely that there is no demand for strict employment uses in this location, the promotion of alternative uses that retain the employment-generating history of the sites seems entirely appropriate. However, it is questionable, given market conditions, both past and present, whether the promotion of an 'employment-led mixed use scheme', as envisaged in the latest consultation draft of the Site and Policies DPD, is realistic or indeed deliverable.	Sufficient information has been provided to the council regarding the demand for strictly B class uses on the site, which evidence suggests is limited. This has prompted the inclusion of the site in the Sites and Policies Plan for alternative uses. The site is identified as a LSIS and this forms the basis for allocating the site for an employment led regeneration of the site. The council therefore acknowledges that alternative uses can be accommodated on the site as a result. It is not considered appropriate that the site should be excluded from providing employment led uses as it is a LSIS as outlined in the Core Strategy as well as considered a "good location" in Merton's Employment and Economic Land Study 2010. The site is therefore allocated for employment led regeneration in line with these two documents, however a range of alternative uses is provided in the allocation. The council's position is considered to be in general accordance with these comments made.
<b>R025/C079</b>	Friends Life Limited	Site 48 Bushey Road	d) FLL Timescales: As mentioned, it is premature to be discussing FLL's aspirations for the site and the fund is still considering the options available to it. However, the age and poor condition of 80 Bushey Road coupled with the lack of demand for the vacant buildings at 84-86 Bushey Road indicates that a comprehensive redevelopment of the two sites (comprising 80-86 Bushey Road) is an obvious proposition in 2015, subject to Pets at Home's leasehold interest being protected.	The comments regarding the deliverability of 84-86 Bushey Road are acknowledged.
<b>R025/C080</b>	Friends Life Limited	Site 48 Bushey Road	e) Position Statement: We have already identified to the Council that 80 Bushey Road is in poor condition and the current lease arrangement would allow for the site to be redeveloped if the break is exercised in 2015. Pets at Home would need to be accommodated on the site under the terms of the lease arrangements. In terms of 84-86 Bushey Road, given the infancy of the acquisition, it is too early to identify the fund's development aspirations for the site, but there is clearly logic for having brought the site within FLL ownership, given their adjoining landholding at 80 Bushey Road. Marketing evidence and prevailing market conditions confirms a lack of interest in the buildings under the current uses. Furthermore, advice from agents suggests that this is not an office or industrial location, as evidenced through widespread long term vacancies. The development of an employment-led scheme would appear to be unlikely. A broader range of employment-generating uses therefore appears to be far more appropriate use of the site, retaining the spirit of its historic use. A number of alternative uses are already identified in the emerging DPD, but the policy indicates that any proposals would need to be employment-led which we do not believe is realistic. It is therefore highly unlikely that an employment-led scheme on 84-86 Bushey Road will be deliverable for the reasons identified by FLL and other parties.	This first part of the comment refers to an adjoining site which was previously included in the site allocation but subsequently removed as the owners stated to the council that only an expansion of the existing A1 use on the site was proposed. This was not supported from a planning policy perspective and did not require a strategic allocation as an expansion is more appropriately considered as part of a planning application. The site has been assessed for its suitability as an industrial site as recently as 2010 and 2011. Merton's Employment and Economic Land Study 2010 identified the site as being "god quality" and stated it should be retained as a mainly industrial site. Merton's Core Planning Strategy 2011 recognised this study and retained the site as a Locally Significant Industrial Site. The allocation for an employment led redevelopment has been primarily based on these two documents. Since this time, two of the larger buildings on the site primarily used for office use have been vacant since 2010. Marketing evidence submitted to the council illustrates that the site is not suitable for on-going office use in the current market conditions. The evidence therefore suggests a lack of market interest in office use only. The site allocation reflects this information by allocating the site for an employment led mixed use scheme, with options for alternative uses considered appropriate on the site. The allocation doesn't require whole site to be employment uses and enables a range of alternative uses considered suitable to the location taking into account the out of centre location, the LSIS designation, the flood risk, its proximity to the A3 and relatively poor level of access to public transport. The allocation provides for an employment led mixed use development

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
				which ensures an employment component to redevelopment which is consistent with the LSIS designation, but also a range of alternative uses which are considered suitable on the site. The two vacant buildings on the site were both historically B1[a] uses with offices and these are the only buildings on the site which have been vacant for a period of time. Office uses have therefore not been included in the allocation due to the prevalence of market evidence which suggests they are not viable in current market conditions. Overall, it is considered that the allocation enables regeneration of the site which is consistent with local research and evidence (Employment and Economic Land Study, Core Strategy) regarding the provision of employment uses on the site, but recognises that flexibility can be provided as suggested in the representation with a range of alternative uses considered suitable for the site.
R049/C158c	National Grid	Site 50 Waterside Way	National Grid appreciates the consideration of issues highlighted in our previous consultation in relation to sites 37, 50, 59, 75 and 78. We note that site 50 appears to have been omitted from the Submission Plan, if this is not the case please advise.	This site has been removed from the Sites and Policies Plan. No action needed.
R036/C113a	Lionsgate Properties	Site 53 Brook House, Mitcham	I am responding to the pre submission consultation (July - August 2013) of the above document on behalf of my client, Lionsgate Properties, who are the freehold owners of Brook House, 1A Cricket Green, Mitcham, CR4 4LA and which is identified as "Site Proposal 53" (to become Site 17 if adopted). The proposed future uses - D1, C2, C1 and C3 - either as individual uses or as part of a mixed use development accord with the range of alternative uses suggested by the owners and are regarded as the most appropriate and suitable for the site. Given the continuing vacancy of the site, the delivery timescale of 2014 - 2018 is also regarded as both appropriate and realistic. Please let me know when the plan is submitted to the Secretary of State and my client's would also like the opportunity to attend the Examination in Public especially if any objections from third parties are outstanding in relation to the site and the proposals for the future alternative uses. Please let me know if you have any queries at this stage regarding this consultation response.	Support for the allocation.
R068/C241	Thames Water	Site 53 Brook House, Mitcham	On the information available to date we do not envisage infrastructure concerns regarding potable water capability in relation to this site. We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development [ Sewer capacity assessment carried out for sites 37017, 37022, 37021 and 37013 which are likely to discharge to the same sewer hence sewer capacity issues identified]. Drainage Infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."
R036/C113b	Lionsgate Properties	Site 53 Brook House, Mitcham	Support for the allocation.	Support for the allocation.
R081/C397	Wimbledon Society	Site 53 Brook House, Mitcham	These sites face onto the Cricket Green, an area that whilst not in the immediate area of Wimbledon, nevertheless has a very significant history in Merton, including that of the evolution of the birth of Cricket. The present Cricket Pavilion is separated from the actual playing pitch by the very busy A239 (also called Cricket Green). This arrangement might have been acceptable in past years, but is now far from ideal with modern traffic conditions. These two sites 21 & 53 face onto the cricket pitch, and are separated from it by a very much quieter cul-de-sac. Might this present an opportunity to provide a new Pavilion on their road frontage, (with suitable development at the rear), and develop the then vacated existing Pavilion in due course?	Not taken forward. The council has not received any information to suggest that the existing cricket pavillion should be redeveloped. The site is currently leased by the cricket club who intend to remain on the site. The existing cricket pavillion is a locally listed building and therefore has existing policy restrictions on redevelopment. As a result, the suggestion made is not being considered as part of the Sites and Policies Plan.
R045/C153	Mitcham Cricket Green Community and Heritage Group	Site 53 Brook House, Mitcham	We support the re-use of Brook House which has remained under-used for many years. We are not prescriptive about the future use of this building but the final document needs to acknowledge the constraints due to the sensitive access along Cricket Green, as recognised by the Cricket Green Charter: "Retaining and enhancing the character of Cricket Green road running alongside the east of the cricket ground should be a starting point for any future	The allocation references the matters raised. General support for the allocation.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			development in Birches Close or at Brook House"	
R027/C097e	GLA	Site 57 Morden station offices and retail	The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.	The text in the site allocation will be amended to refer to the requirement.
R072/C271	Transport for London	Site 57 Morden station offices and retail	<p>This Representation should not be taken to represent an indication of any subsequent Mayoral decision in relation to the emerging policy document.</p> <p>Following our previous representations and ongoing discussions with the Future Merton Team on these sites and their including in the "moreMorden" project, TfL continues to welcome the site designations identified as sites 57 to 61 and related polices, and supports the flexible approach taken by the Council.</p> <p>As per previous correspondence, TfL Property stress the following caveats:</p> <p>(i). that all of the TfL Property sites have an existing use value and their redevelopment in line with any of the proposed uses is subject to a thorough viability assessment;</p> <p>(ii). that redevelopment of the sites is conditional upon the site becoming surplus to TfL operational requirements, and/or that the proposed redevelopment is appropriately designed to fully acknowledge any TfL operational constraints the site is subject to.</p> <p>TfL Property welcomes continued discussion with LB Merton regarding the redevelopment aspiration of TfL landholdings in the area and looks forward to further assisting in the delivery of the Council's vision for an improved town centre for Morden.</p>	Support for the allocation. No action needed.
R027/C097a	GLA	Site 58 Baltic close, Colliers Wood	The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.	The text in the site allocation will be amended to refer to the requirement.
R027/C097f	GLA	Site 58 Sainsbury's car park, Morden	The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.	The text in the site allocation will be amended to refer to the requirement.
R072/C272	Transport for London	Site 58 Sainsbury's car park, Morden	<p>This Representation should not be taken to represent an indication of any subsequent Mayoral decision in relation to the emerging policy document.</p> <p>Following our previous representations and ongoing discussions with the Future Merton Team on these sites and their including in the "moreMorden" project, TfL continues to welcome the site designations identified as sites 57 to 61 and related polices, and supports the flexible approach taken by the Council.</p> <p>As per previous correspondence, TfL Property stress the following caveats:</p> <p>(i). that all of the TfL Property sites have an existing use value and their redevelopment in line with any of the proposed uses is subject to a thorough viability assessment;</p> <p>(ii). that redevelopment of the sites is conditional upon the site becoming surplus to TfL operational requirements, and/or that the proposed redevelopment is appropriately designed to fully acknowledge any TfL operational constraints the site is subject to.</p> <p>TfL Property welcomes continued discussion with LB Merton regarding the redevelopment aspiration of TfL landholdings in the area and looks forward to further assisting in the delivery of the Council's vision for an improved town centre for Morden.</p>	Support for the allocation. No action needed.
R068/C242	Thames Water	Site 58 Sainsbury's car park, Morden	<p>We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. Water supply infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a water supply strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the likely event of an upgrade to our assets being required, there could be a period of upto 3 years required for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian style planning condition to ensure the infrastructure is in place ahead of occupation of the development.</p> <p>We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development [ sewer capacity assessment carried out for sites 37028, 37032 and 37030 which are likely to discharge to the same sewer hence sewer capacity issues identified]. Drainage Infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the</p>	The text will be amended in accordance with the suggestion as follows: <b>"Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."</b>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure; alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.	
<b>R049/C158d</b>	National Grid	Site 59 Baltic Close, Colliers Wood	National Grid appreciates the consideration of issues highlighted in our previous consultation in relation to sites 37, 50, 59, 75 and 78. We note that site 50 appears to have been omitted from the Submission Plan, if this is not the case please advise.	Support for the allocation and wording. No action needed.
<b>R068/C243</b>	Thames Water	Site 59 Baltic Close, Colliers Wood	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
<b>R027/C097g</b>	GLA	Site 59 Baltic Close, Colliers Wood	The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.	The text in the site allocation will be amended to refer to the requirement.
<b>R068/C244</b>	Thames Water	Site 60 York Close car park, Morden	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
<b>R072/C273</b>	Transport for London	Site 60 York Close car park, Morden	This Representation should not be taken to represent an indication of any subsequent Mayoral decision in relation to the emerging policy document. Following our previous representations and ongoing discussions with the Future Merton Team on these sites and their including in the "moreMorden" project, TfL continues to welcome the site designations identified as sites 57 to 61 and related polices, and supports the flexible approach taken by the Council. As per previous correspondence, TfL Property stress the following caveats: (i). that all of the TfL Property sites have an existing use value and their redevelopment in line with any of the proposed uses is subject to a thorough viability assessment; (ii). that redevelopment of the sites is conditional upon the site becoming surplus to TfL operational requirements, and/or that the proposed redevelopment is appropriately designed to fully acknowledge any TfL operational constraints the site is subject to. TfL Property welcomes continued discussion with LB Merton regarding the redevelopment aspiration of TfL landholdings in the area and looks forward to further assisting in the delivery of the Council's vision for an improved town centre for Morden.	Support for the allocation. No action needed.
<b>R027/C097h</b>	GLA	Site 61 Morden station staff car park	The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.	The text in the site allocation will be amended to refer to the requirement.
<b>R072/C274</b>	Transport for London	Site 61 Morden station staff car park	This Representation should not be taken to represent an indication of any subsequent Mayoral decision in relation to the emerging policy document. Following our previous representations and ongoing discussions with the Future Merton Team on these sites and their including in the "moreMorden" project, TfL continues to welcome the site designations identified as sites 57 to 61 and related polices, and supports the flexible approach taken by the Council. As per previous correspondence, TfL Property stress the following caveats: (i). that all of the TfL Property sites have an existing use value and their redevelopment in line with any of the proposed uses is subject to a thorough viability assessment; (ii). that redevelopment of the sites is conditional upon the site becoming surplus to TfL operational requirements, and/or that the proposed redevelopment is appropriately designed to fully acknowledge any TfL operational constraints the site is subject to. TfL Property welcomes continued discussion with LB Merton regarding the redevelopment aspiration of TfL landholdings in the area and looks forward to further assisting in the delivery of the Council's vision for an improved town centre for Morden.	Support for the allocation. No action needed.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R062/C195a	Sport England	Site 62 Wimbledon YMCA	<p>Planning Policy Objective 6 within Sport England's Spatial Planning for Sport and Active Recreation: Development Control Guidance Note (2009) Appendix (<a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/</a>), aims to ensure that there is no further reduction in the supply of conveniently located, quality playing fields for sport to satisfy current and likely future demand. Sport England will normally oppose development that would lead to the loss of, or prejudice the use of, all or part of a playing field, without meeting at least one of the specific exception criteria identified in Sport England's policy 'A Sporting Future for the Playing Fields of England' (1997), a copy of which can be downloaded from our website at <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</a>. The following sites include (or potentially include) existing sports facilities:</p> <ul style="list-style-type: none"> <li>• Wimbledon YMCA</li> <li>• Wimbledon Greyhound Stadium</li> <li>• Southey Bowling Club</li> </ul>	General support for the allocation which includes the ability to establish sports facilities as well as containing existing sports facilities.
R068/C245	Thames Water	Site 62 Wimbledon YMCA	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. Water supply infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a water supply strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the likely event of an upgrade to our assets being required, there could be a period of upto 3 years required for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian style planning condition to ensure the infrastructure is in place ahead of occupation of the development. On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."
R081/C349	Wimbledon Society	Site 62 Wimbledon YMCA	<p>Wimbledon YMCA building: Site 62: page 352: This site is within the "Culture and Arts" zone, identified in the Wimbledon Way report, and the street level uses should therefore be predominantly for Community, Arts and Leisure. As written, the open-ended nature of the list of potential uses allows a future developer to select only those that are currently commercially attractive. The other uses, although listed, may simply never be provided. Therefore: ADD to the Site description: "The site is within Wimbledon Town Centre, AND IN THIS SECTION OF THE BROADWAY BETWEEN THE TWO THEATRES, ARTS, LEISURE AND CULTURE USES ARE TO BE ENCOURAGED." ADD to the Allocated use paragraph: "COMMUNITY, LEISURE AND ARTS USES SHOULD PREDOMINATE ON THE STREET AND LOWER LEVELS, WITH a suitable mix of etc etc". Additionally, this is a site that should be identified as a potential contributor to a town centre CHP scheme. (See comments on Policy DMEP1).</p>	Not taken forward. As illustrated in Merton's Core Planning Strategy policy CS6 "Wimbledon" (c) and on the Wimbledon sub-area diagram, a cultural quarter is already recognised in the Local Plan at this end of The Broadway. The majority of this end of the Broadway area is located in the secondary shopping frontage where a wide range of uses are encouraged therefore a new policy is not required. Similarly, the creation of a Civic Hall in Wimbledon town centre and Wimbledon Way do not require policies. The Wimbledon Way is a heritage walk in and around Wimbledon town centre set up to celebrate the Olympics. There is a plan for this project with initiatives set out. Although the council does not intend to build a new Civic Hall; the site allocations in Wimbledon allow for this, should another party want to take it forward.
R081/C350	Wimbledon Society	Site 63 165-171 The Broadway, Wimbledon	<p>165-1 71 The Broadway: Site 63: page 355/6: High buildings on the southern side of the Broadway cast a substantial shadow, and in the winter months, no sun can reach the northern footway, making it sombre and cold. At present, there is a gap in the southern street facade which allows sunlight through, and this should be maintained in any redevelopment. The height of the southern street facade should be limited in height for the same reason. Therefore: ADD to the Issues section a new second paragraph: "THE PRESENT GAP IN THE STREET FAÇADE SHOULD BE MAINTAINED, TO ALLOW ADEQUATE SUNLIGHT THROUGH TO THE BROADWAY. THE BUILDING SHOULD BE NO HIGHER THAN THE CIPD BUILDING NEARBY." Add to the Issues section final paragraph: "...congestion and road safety. CONSIDERATION SHOULD BE GIVEN TO PROVIDING SERVICE ACCESS ACROSS THE REAR OF THE SITE TO SERVE THE ADJOINING SITE 153-1 61. Mitigate and manage" The last two lines: "Council has..." should be omitted.</p>	Not taken forward. Merton's Core Planning Strategy policy CS6 Wimbledon, supported by Merton's Tall Buildings Background paper, sets out the parameters for tall buildings along The Broadway, seeking a homogeneity of building heights to avoid the "gap toothed" effect that currently exists. The servicing requirements of this site should not be linked to issues or aspirations surrounding neighbouring site/s. Consideration of facilitating joint access could realistically only be considered if both sites were jointly developed.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R081/C400	Wimbledon Society	Site 63 165-171 The Broadway, Wimbledon	High buildings on the southern side of the Broadway cast a substantial shadow, and in the winter months, no sun can reach the northern footway, making it sombre and cold. At present, there is a gap in the southern street facade which allows sunlight through, and this should be maintained in any redevelopment. The height of the southern street facade should be limited in height page for the same reason. Therefore, ADD to the Issues section a new second paragraph: "THE PRESENT GAP IN THE STREET FAÇADE SHOULD BE MAINTAINED, TO ALLOW ADEQUATE SUNLIGHT THROUGH TO THE BROADWAY. THE BUILDING SHOULD BE NO HIGHER THAN THE CIPD BUILDING NEARBY." Add to the Issues section final paragraph: "...congestion and road safety. CONSIDERATION SHOULD BE GIVEN TO PROVIDING SERVICE ACCESS ACROSS THE REAR OF THE SITE TO SERVE THE ADJOINING SITE 153-161. Mitigate and manage....." The last two lines: "Council has..." should be omitted.	The council has deliberately not provided detailed design guidance for any sites in the Sites and Policies Plan. The council considers it more appropriate to consider design related issues once the scale and form of development is known and supported with evidence and information forming part of a planning application. The council considers that there is sufficient policy and council issues documents which will provide suitable design guidance for any future development (e.g. Merton Council's Tall Buildings Background Paper and emerging DM policies). The suggested wording to be removed will be removed from the final document as stated in the allocation.
R081/C399	Wimbledon Society	Site 63 165-171 The Broadway, Wimbledon	This site is within the "Culture and Arts" zone, identified in the Wimbledon Way report, and the street level uses should therefore be predominantly for Community, Arts and Sporting/Leisure. As written, the open-ended nature of the list of potential uses allows a future developer to select only those that are currently commercially attractive. The other uses, although listed, may simply never be provided. Therefore, ADD to the Site description: "The site is located within Wimbledon Town Centre..... .....and residential uses. IN THIS SECTION OF THE BROADWAY, BETWEEN THE TWO THEATRES, ARTS/CULTURE/LEISURE USES ARE TO BE ENCOURAGED". ADD to the Allocated use paragraph: "COMMUNITY, SPORTING/LEISURE AND ARTS USES SHOULD PREDOMINATE ON THE STREET AND LOWER LEVELS, with a mix of .....etc".	Not taken forward. As illustrated in Merton's Core Planning Strategy policy CS6 "Wimbledon" (c) and on the Wimbledon sub-area diagram, a cultural quarter is already recognised in the Local Plan at this end of The Broadway. The majority of this end of the Broadway area is located in the secondary shopping frontage where a wide range of uses are encouraged therefore a new policy is not required. Similarly, the creation of a Civic Hall in Wimbledon town centre and Wimbledon Way do not require policies. The Wimbledon Way is a heritage walk in and around Wimbledon town centre set up to celebrate the Olympics. There is a plan for this project with initiatives set out. Although the council does not intend to build a new Civic Hall; the site allocations in Wimbledon allow for this, should another party want to take it forward.
R068/C246	Thames Water	Site 63 165-171 The Broadway, Wimbledon	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. Water supply infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a water supply strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the likely event of an upgrade to our assets being required, there could be a period of upto 3 years required for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian style planning condition to ensure the infrastructure is in place ahead of occupation of the development.  We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. Water supply infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a water supply strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the likely event of an upgrade to our assets being required, there could be a period of upto 3 years required for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian style planning condition to ensure the infrastructure is in place ahead of occupation of the development.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."
R081/C351	Wimbledon Society	Site 64 12a Ravensbury Terrace, Wimbledon	12A Ravensbury Terrace: Site 64: page 357: Ditto Site 70: page 361: Transport proposal 24TN for a pedestrian/cycle bridge across the river to link to Earlsfield Station and the local centre (in LB Wandsworth), is supported.	Support for the reference.
R068/C247	Thames Water	Site 64 12a Ravensbury Terrace, Wimbledon	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R081/C401	Wimbledon Society	Site 64 12a Ravensbury Terrace, Wimbledon	Transport proposal 24TN for a pedestrian/cycle bridge across the river to link to Earlsfield Station and the local centre (in LB Wandsworth), is supported.	Support for the text. No action needed.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R065/C204	Stone M	Site 64 12a Ravensbury Terrace, Wimbledon	<p>We welcome the preparation of site specific policies for Merton and are supportive of the approach taken by the Council. As you will be aware, we have been working closely with Merton Council for a number of years to bring forward a mixed use development at Ravensbury Terrace. We are pleased that the Council supports the principle of mixed use development at the site and that the Sites and Policies Plan identifies 12A Ravensbury Terrace as Site Proposal 64 (page 357, if adopted this site will become Site 41).</p> <p>We confirm that an application is currently being prepared for the redevelopment of our client's site to provide 353 square metres office (Class B1) and nine residential units (Class C3). The application is due to be submitted within the couple of weeks. This demonstrates that the owner considers the site to be deliverable for mixed use development within the short term. The inclusion of the site within Merton's Sites and Policies Plan is therefore considered appropriate.</p>	Support for the allocation.
R027/C096	GLA	Site 65 Kenley Road car park, Morden	21. TfL previously identified this site as a potential location to provide additional bus standing space as required to meet additional demand in the area. Following these comments the Council has published a draft Morden Station Planning Brief. Within the wider Morden Station site, bus stops and standing must be protected unless a suitable alternative site within the town centre can be found which does not result in a loss of capacity or convenience for bus passengers. TfL maintains that the sites should be allocated for this purpose.	Further comments received from TfL on 17 September 2013 (after the consultation period) stated that they wish to withdraw previous comments made regarding the bus standing space on the site.
R068/C248	Thames Water	Site 65 Kenley Road car park, Morden	On the information available to date we do not envisage infrastructure concerns regarding potable water capability in relation to this site. We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development [ sewer capacity assessment carried out for sites 37028, 37032 and 37030 which are likely to discharge to the same sewer hence sewer capacity issues identified]. Drainage Infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.	The text will be amended in accordance with the suggestion as follows: <b>"Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."</b>
R027/C097i	GLA	Site 65 Kenley Road car park, Morden	The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.	The text in the site allocation will be amended to refer to the requirement.
R027/C097	GLA	Site 69 Sibthorp Road car park, Mitcham	22. This site includes London buses driver facilities and toilets and any redevelopment of this site must maintain or replace these facilities. TfL requests that the policy wording includes safeguarding of these facilities in accordance with London Plan Policy 6.2 and the Land for Industry and Transport SPG.	The text will be amended in accordance with the suggestion.
R068/C249	Thames Water	Site 69 Sibthorp Road car park, Mitcham	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: <b>"Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."</b>
R084/C377	Astranta Asset Management	Site 70 Haslemere Industrial Estate, Wimbledon	<p>2) Access</p> <p>The Estate is close to Earlsfield Overground Station which provides frequent mainline rail services into Waterloo and Clapham Junction and links to destinations such as Dorking and Woking. Regular bus services are available in Garratt Lane.</p> <p>Road Access to the site by car is available via a number of different suburban routes from Garratt Lane (A217) and Merton Road (A218). Due to existing road width restrictions lorry and emergency vehicle access is only available to Garratt Lane via Penwith Road and Ravensbury Terrace.</p> <p>Recently Wandsworth Council have proposed to further reduce the width of Ravensbury Terrace which would result in very limited access to the industrial estate, whereby not even a van would be able to access the site and we consider would therefore put many companies out of business.</p> <p>Even if this proposal is not implemented, it demonstrates the inability of the local network to satisfactorily cater for large vehicles required to appeal to industrial/warehouse occupiers.</p>	Supporting evidence for the allocation. The comments are noted.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R084/C378	Astranta Asset Management	Site 70 Haslemere Industrial Estate, Wimbledon	<p>3) Building Description</p> <p>Unit 1: Unit 1 was subject to a basic refurbishment and divided into 2 units (1a &amp; 1b) in 21.1.11111111 comprises the following approximate areas.</p> <p>Unit 1a is approx 5,000 sq ft of which approx 1,900 sq ft is office accommodation. Despite the recent refurbishment the units still suffer from restricted floor to ceiling heights, poor internal circulation and poor energy efficiency.</p> <p>Unit 1b is of similar size and specification to Unit 1a.</p> <p>Unit 2 is approx 15,150 sq ft plus a later addition of about 1,300 sq ft production area. The offices comprise approx 1,400 sq ft converted to staff changing facilities, a canteen and toilets. The windows are single glazed and there is central heating, a gas boiler, and hot and cold running water. If this unit was to be used as a stand alone unit a new office area would need to be created. There are no disabled facilities and the main production hall has asbestos sheet roofing. There are limited loading arrangements and car parking facilities with this unit.</p> <p>Unit 3 is approx 9,900 sq ft, of which approx 900 sq ft is offices. The offices have hot and cold water from an electric immersion heating and no heating (only portable electric heaters). The windows are single glazed and there are no disabled facilities. The main production hall has asbestos coating on steel frame with asbestos sheet roofing and cladding. There are limited loading arrangements and car parking facilities with this unit.</p> <p>Unit 4 is approx 12,500 sq ft comprising a detached warehouse with two storey office accommodation to the front elevation totalling approx 1,300 sq ft. The windows are single glazed and the building comprises a steel frame with asbestos sheet roofing.</p>	Supporting evidence for the allocation. The comments are noted.
R084/C379	Astranta Asset Management	Site 70 Haslemere Industrial Estate, Wimbledon	<p>4) Marketing Details</p> <p>Unit 1a was marketed by Houston Lawrence and Laidlaw &amp; Company between December 2011 through to December 2012. Our marketing particulars are attached for your interest.</p> <p>Although there was quite widespread interest there were few potential occupiers who viewed the building twice. Many of these occupiers sought either modern high bay warehouse units or office space with few requiring a mix of both.</p> <p>The property suffers from poor vehicular access (which has definitely deterred some potential occupiers) and a poor energy efficiency rating (an issue of increasing importance in today's market with spiralling energy costs) for the property to be a competitive choice to potential occupiers in the area.</p> <p>We have agreed terms to let the unit on a short term (ie temporary) basis to a leisure user. It seems that for the future, particularly because of access difficulties this type of user represents the long term norm.</p>	Supporting evidence for the allocation. The comments are noted.
R084/C380	Astranta Asset Management	Site 70 Haslemere Industrial Estate, Wimbledon	<p>5) Interest/Demand elsewhere &amp; Availability</p> <p>Most of the interest in this area is for units with more flexibility and we have found that those occupiers looking for a higher (or even total) content of office space would prefer an estate such as The Rufus Business Centre, which comprises mostly business (office) space, while those looking for a more industrial use tend to opt for other local estates such as Summerstown Industrial Estate, The Garratt Business Park, Ferrier Industrial Estate and Thornsett Road Industrial Estate. All of these estates benefit from better access and generally higher industrial/warehouse space ratios.</p>	Supporting evidence for the allocation. The comments are noted.
R084/C381	Astranta Asset Management	Site 70 Haslemere Industrial Estate, Wimbledon	<p>6) Other Uses</p> <p>Redevelopment and adaptation of the estate in its existing format or use types is unlikely to be economical and will be impaired radically if LW Wandsworth proceed to restrict the road width on the access approaches.</p> <p>The future of this estate is in our opinion for mixed used development incorporating smaller commercial units (with B1 and D1 uses) with an emphasis on residential use.</p> <p>We understand that your Council is currently reviewing the status of The Plan for this industrial estate and believe that a move away from industrial to residential and small employment uses such as gym, leisure, office or D1 uses are the best way forward.</p>	Supporting evidence for the allocation. The comments are noted.
R089/C426	Internal	Site 70 Haslemere Industrial Estate, Wimbledon	Amend site map to show correct area of ownership	The map has been amended.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R084/C375	Astranta Asset Management	Site 70 Haslemere Industrial Estate, Wimbledon	<p>Conclusions</p> <p>The site is currently reaching the end of its economic life and its redevelopment for industrial use can simply not be justified in financial terms, nor is it in a location or capable of offering the unit size or access for lorries, which is required by industrial occupiers.</p> <p>In terms of the potential for continued industrial use on the site, it is understood that there is currently little demand for this type of industrial floorspace in the Borough and that once the existing tenants vacate, it is likely that the buildings will lie vacant.</p> <p>Given that it is not viable to redevelop the site for industrial scheme, in order to ensure that the best use of previously developed land is made and the site does not lie vacant in perpetuity; its redevelopment for other uses should be considered.</p> <p>Considering the close proximity to existing homes, a mixed use employment / residential redevelopment would offer the opportunity to improve the residential amenity of those people who live nearby, provide new homes for residents in Merton as well as offering a financially viable solution to ensuring that the site does not lie vacant for the foreseeable future. It will also help the Borough to meet the new Government incentives for the building of new homes.</p> <p>Furthermore, the London Borough of Wandsworth is concerned that the Industrial Estate has a negative effect on the surrounding residential dwellings and is proposing a width restriction which will prevent all goods vehicles larger than a small panel van (such as those used for home delivery) from easily accessing the site.</p> <p>Clearly, this is at odds with its use for industrial purposes and as such the emerging policy framework should allow for its redevelopment for alternative uses (including residential) without the need to show 30 months of marketing for the units.</p> <p>On this basis, Haslemere Industrial Estate should continue to be allocated for an employment led redevelopment and the allocation widened to confirm that residential development would be acceptable in the Council's emerging Site Allocation &amp; Policies Development Plan Document along with the minor change being made to Policy DME3.</p>	The comments are noted.
R084/C372	Astranta Asset Management	Site 70 Haslemere Industrial Estate, Wimbledon	<p>Difficulties in the continued industrial use of the buildings</p> <p>As set out in the previous representations, the Estate has come to the end of its economic life and in terms of the large amount of investment required to bring the buildings up to modern standards; it is simply not viable to do so. The reasons for this are three-fold. Firstly, there is little or no demand for industrial units in this location therefore; there is no justification for the financial outlay for the Estate's redevelopment. This is because any speculative industrial development is likely to lay vacant for significant period of time or to attract a tenant, will have to be marketed at a rate that is unlikely to provide enough income to break even (particularly given the initial financial outlay).</p> <p>Secondly, the size and location of the units on the site do not meet with market requirements. Namely, larger units which are not in close proximity to residential dwellings, in areas with good road access where larger vehicles do not have to negotiate a route along narrow residential streets. A letter from Houston Lawrence (Commercial Agents) is attached and sets out the problems it has faced trying to let the buildings.</p> <p>Thirdly, The London Borough of Wandsworth is proposing to implement a width restriction on surrounding roads, which will prevent lorries from accessing the site, again severely affecting the viability of the existing units to continue to operate for industrial / warehousing purposes.</p> <p>If the proposed width restriction is implemented as planned it will also affect the viability of modernising the estate or redeveloping it as the width restriction will deter most potential occupiers from considering the site.</p>	The comments have been acknowledged during previous consultation stages and are referred to in the site allocation.
R084/C371	Astranta Asset Management	Site 70 Haslemere Industrial Estate, Wimbledon	<p>Haslemere Industrial Estate, is a small ageing Estate comprising of four industrial units. These representations seek to support the possibility of accommodating alternative uses on the site, such as residential, which the need for (at least in part) has been recognised by the Council in the emerging guidance.</p> <p>Background</p> <p>The site is situated between Garratt Lane and Merton Road, which both have good access to public transport / buses with the closest railway station being Earlsfield Railway Station (with direct connections to Clapham Junction (3 mins) Vauxhall (5 mins) and Waterloo (10 mins). It is 5 minutes walking distance from the site. The site therefore benefits from a Public Transport Accessibility Level (PTAL) rating of 4.</p> <p>It is accessed off Ravensbury Terrace and as stated above is known as Haslemere Industrial Estate. It is approximately 0.9 hectares in size and comprises of four units.</p> <p>The site is bounded to the north by Haslemere Avenue (a predominately residential street), to the east by the River Wandle with the local and national railway lines beyond. To the south (beyond the Rufus Business Centre) is Wimbledon Park Primary School and to the west are mainly residential dwellings.</p>	The comments regarding the background of the site are noted.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			All four units within the park are dated (circa 1920s) and are reaching the end of their life.	
R068/C250	Thames Water	Site 70 Haslemere Industrial Estate, Wimbledon	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R040/C385	Mallon M	Site 70 Haslemere Industrial Estate, Wimbledon	Site proposal 70 – please no resi development here – the current resi to industrial mix in the area works well. The local infrastructure (school and recreation ground) is not fit for an increase in resi use	The owner has suggested that residential uses be included in the allocation. The council is not allocating the site for residential uses for several reasons. The primary reasons are that the site is an established scattered employment site with a range of industrial, manufacturing and office uses operating on the site and adjoining properties. The site is also within flood zone 3b which affects residential development. It is preferred that the site is retained as an efficient scattered employment site and if redeveloped, for an employment led redevelopment to predominate. If a residential element was proposed as part of a redevelopment the potential impacts on local infrastructure would be considered at the time a planning application is made and would also be subject to relevant s106/CIL charges to offset the impacts of additional demand created.
R084/C373	Astranta Asset Management	Site 70 Haslemere Industrial Estate, Wimbledon	<p>Stage 3 – Site Proposal 70</p> <p>The Council's assessment of the Estate states that the Council will support a suitable employment led redevelopment and this is supported by Astranta Asset Management and the landowners of Haslemere Industrial Estate. This is because the site benefits from being located in an assessable location, in terms of public transport, and it is immediately bounded by existing residential dwellings indeed dwellings are present on the estate itself as at 12 Ravensbury Terrace, residential use is incorporated within the office development. The vehicular access to the site is also bounded by residential dwellings and is of a residential scale and suitable for private motor cars (rather than larger commercial vehicles).</p> <p>Given the need to accommodate dwellings in the Borough within sustainable locations (such as previously developed land) the Council should consider a flexible approach to employment sites such as this, allocating Haslemere Industrial Estate for employment/residential led mixed use redevelopment in the Council's emerging Site Allocation &amp; Policies Development Plan Document.</p> <p>We understand that the Environment Agency considers that the site lies within Flood Zone 3b (as with other large areas of London) however, it should be noted that to the best of the site owners knowledge the site has never flooded. In any event that any new development could be sensitively designed to mitigate any possible risk, for uses such as residential.</p> <p>This will ensure the best sequentially preferable sites are promoted for residential development a head of less sustainable locations such as greenfield sites or those which do not benefit from being located in existing residential areas close to good transport links and will ensure that the buildings will not lie vacant / deteriorate due to the fact that industrial tenants do not want to use the buildings.</p> <p>Finally it is noted (as per our previously submitted representations) that land close to / adjoining the site is proposed to possibly be safeguarded for the expansion of the district line and Crossrail 2 (Wimbledon Hackney line). Any designation under policy previous policy TN5 now TN4 should reflect Railtrack's ownership and not that of adjacent landowners as Railtrack/TfL will have no control over the land.</p> <p>On this basis, the designation should be amended if it infringes on Haslemere Industrial Estate.</p>	General support for the allocation. The future mix of uses will be subject to meeting policy, evidence and consultation as stated in the allocation. Regarding the rail designation, it refers to existing safeguarding for the original Crossrail 2 (Wimbledon Hackney line) designation. Current directive from TfL states that this cannot be amended until such time that the new safeguarding maps have been produced; therefore it must remain on the Policies Map.
R084/C376	Astranta Asset Management	Site 70 Haslemere Industrial Estate, Wimbledon	<p>Units 1a, 1b, 2, 3 and 4 Haslemere Industrial Estate London, SW18 4.1E</p> <p>We write in connection with the above industrial units and their continued suitability to meet modern market conditions and their attractiveness to potential occupiers.</p> <p>1) Site Description &amp; Location</p> <p>Together the 4 properties comprise Haslemere Industrial Estate which is located in Earlsfield in London Borough of Merton but adjacent to the border with Wandsworth. Earlsfield is situated to the south of Wandsworth, approximately 7 miles south west of Central London. The subject properties are located off the west side of Garratt Lane, approached via Penwith Road and Ravensbury Terrace which runs into Haslemere Avenue, one of a grid of residential thoroughfares between Garratt Lane and Merton Road.</p> <p>The site extends to approximately 0.9 hectares.</p>	Supporting evidence for the allocation. The comments are noted.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
			It is believed to have been developed in phases between the 1920s and 1960s and was originally an Incandescent Mantle Works.	
<b>R081/C402</b>	Wimbledon Society	Site 74 Southey Bowls Club, Raynes Park	As the whole of this site is currently a Bowls Club (page 321), it should all be classed as open space, not just the actual playing green. (see site PO38, page 283). The Policies Map should be amended accordingly.	Not taken forward. The bowling green is proposed for open space designation. The car park and existing clubhouse are proposed for allocation for residential development by the Bowls Club themselves, in order to support continued financial sustainability of the club.
<b>R068/C251</b>	Thames Water	Site 74 Southey Bowls Club, Raynes Park	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
<b>R062/C195b</b>	Sport England	Site 74 Southey Bowls Club, Raynes Park	Planning Policy Objective 6 within Sport England's Spatial Planning for Sport and Active Recreation: Development Control Guidance Note (2009) Appendix ( <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/</a> ), aims to ensure that there is no further reduction in the supply of conveniently located, quality playing fields for sport to satisfy current and likely future demand. Sport England will normally oppose development that would lead to the loss of, or prejudice the use of, all or part of a playing field, without meeting at least one of the specific exception criteria identified in Sport England's policy 'A Sporting Future for the Playing Fields of England' (1997), a copy of which can be downloaded from our website at <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</a> . The following sites include (or potentially include) existing sports facilities: <ul style="list-style-type: none"> <li>• Wimbledon YMCA</li> <li>• Wimbledon Greyhound Stadium</li> <li>• Southey Bowling Club</li> </ul>	General support for the allocation which includes the ability to establish sports facilities as well as containing existing sports facilities.
<b>R081/C352</b>	Wimbledon Society	Site 74 Southey Bowls Club, Raynes Park	PO38: page 221: This site, bounded by the properties that face onto Kingston Road, Lower Downs Road and Abbott Avenue should all be shown as Open Space, its current use: The identification of only the actual bowls green as open space should not be accepted: See comments on Site 74: page 321.	The site is allocated for residential use which has been agreed by the council for submission to the Secretary of State. Because the remainder of the site is allocated for residential use it would not be able to be delivered as open space, therefore cannot be allocated as open space. The designation of the bowling green itself will protect this portion of the site in perpetuity.
<b>R081/C353</b>	Wimbledon Society	Site 74 Southey Bowls Club, Raynes Park	Southey Bowling Club: site 74: page 321: As the whole of this site is currently a Bowls Club (page 321), it should all be classed as open space, not just the actual playing green. (see site PO38, page 283). The Policies Map should be amended accordingly.	The site is allocated for residential use which has been agreed by the council for submission to the Secretary of State. Because the remainder of the site is allocated for residential use it would not be able to be delivered as open space, therefore cannot be allocated as open space. The designation of the bowling green itself will protect this portion of the site in perpetuity.
<b>R049/C158e</b>	National Grid	Site 75 Former Mitcham Gasworks	National Grid appreciates the consideration of issues highlighted in our previous consultation in relation to sites 37, 50, 59, 75 and 78. We note that site 50 appears to have been omitted from the Submission Plan, if this is not the case please advise.	Support for the allocation and wording. No action needed.
<b>R068/C252</b>	Thames Water	Site 75 Former Mitcham Gasworks	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply network in this area is unlikely to be able to support the demand anticipated from this development. Water supply infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a water supply strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the likely event of an upgrade to our assets being required, there could be a period of upto 3 years required for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian style planning condition to ensure the infrastructure is in place ahead of occupation of the development. On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site. On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and has identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided."

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R076/C284	Wellsborough Developments Ltd	Site 77 26 Bushey Road	<p>A condition survey of the existing buildings that currently occupy 26 Bushey Road was undertaken in July 2013 following our previous representation; the conclusions of which can be summarised below:-</p> <ul style="list-style-type: none"> <li>• There are a total of 14 no. identifiable units and a former Petrol Filling Station (PFS).</li> <li>• The current age of the units is over 60 years and this far exceeds their designed useful life. While the PFS is of more recent construction, circa 1980's, it is in need of a general overhaul to the external envelope including the plant room cladding.</li> <li>• The units generally occupy a single terrace cellular structure built from solid loadbearing brickwork and supporting lightweight roofing. The roof finishes were in a very poor state of dilapidation and where leaking, tenants have placed tarpaulin on top.</li> <li>• Ad hock alterations have occurred over the years to the existing units. These alterations have been generally built in blockwork.</li> <li>• The units have not been adapted well and are not fit for purpose for current employment requirements.</li> <li>• There is clear evidence that a number of the plots which are no longer referenced have been demolished from the hard standing areas left exposed.</li> <li>• Time expired and part occupied.</li> <li>• Evidence of asbestos cement corrugated roofs. An intrusive asbestos survey of the individual units is currently being carried out.</li> <li>• The general risk of significant contamination is considered to be moderate to high due to the former and present site usage including a filling station and vehicle workshops.</li> </ul> <p>This condition survey concludes in relation to 26 Bushey Road that the units are beyond economic repair. In respect to this, redevelopment of the site is not a viable solution due to the high cost and limited returns that this would achieve.</p> <p>The site configuration and access arrangements make this site unsuitable and unviable for modern employment uses. Indeed the site has benefited from two extant planning permissions for employment uses both of which have lapsed and neither of which were taken by the market. These planning permissions were approved in March 2007 and January 2008 and have therefore existed for over 5 years meeting the relevant test. Additionally, remediation of the site to bring it up to environmental standards will only be realised through appropriate residential development.</p>	Support for the allocation. No action needed.
R068/C253	Thames Water	Site 77 26 Bushey Road	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R076/C283	Wellsborough Developments Ltd	Site 77 26 Bushey Road	We previously submitted a representation dated 27th February 2013 in respect to Site Proposal 77 Former Raynes Park Service Station of the Council's Draft Sites and Policies DPD. This detailed our support for the Council's preferred use of 26 Bushey Road for residential development in accordance with national and local planning policy. Our previous comments remain valid and should be read in conjunction with this representation. We are pleased to note that Site Proposal 77 has been considered and accepted by Full Council on the 10th July 2013 for submission to the Secretary of State without any major alterations. Wellsborough Developments Ltd who have since taken control of 26 Bushey Road, are currently preparing a detailed planning application for the site comprising 17 units including 10 flats and 7 houses. "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."	Support for the allocation. No action needed.
R006/C024	Cantor L	Site 78 191-193 Western Road, Colliers Wood	For the reasons stated above, the proposed re-classification of this site from B1/employment to residential use would result in significant benefits for local residents and the Borough generally and we fully support the Council's proposal in this regard	Support for the allocation.
R049/C158f	National Grid	Site 78 191-193 Western Road, Colliers Wood	National Grid appreciates the consideration of issues highlighted in our previous consultation in relation to sites 37, 50, 59, 75 and 78. We note that site 50 appears to have been omitted from the Submission Plan, if this is not the case please advise.	Support for the allocation and wording. No action needed.
R068/C254	Thames Water	Site 78 191-193 Western	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
		Road, Colliers Wood		not envisage infrastructure concerns relating to potable water supply or wastewater services."
R006/C023	Cantor L	Site 78 191-193 Western Road, Colliers Wood	<p>We write on behalf of the current freehold owners (and as intended purchasers) of the above site. This site was identified as Site Proposal 78 within the Council's Stage 2 'Potential Sites for New Uses' (adopted by Cabinet on 11 June 2012) and as part of the consultation process and prior to being passed to the Secretary of State, LB Merton are inviting comments on their proposals.</p> <p>Accordingly we now write as follows:-</p> <ol style="list-style-type: none"> <li>1. Whilst the historic use of the above site is as B1/employment use, the Council have recognised that it would constitute a 'scattered' site and as such, it is appropriate to re-designate it to residential (C3) use and we confirm that we would strongly support such a proposal.</li> <li>2. Being a brownfield site in an established, predominantly residential area, the re-designation of this site from employment use to residential (C3) use will promote sustainable development and will be in full compliance with both regional and national guidance, including the National Planning Policy Framework (2012) as well as the London Plan (2011).</li> <li>3. Despite its historic use as an employment site, the demand for commercial space of this kind has diminished over the years with very few jobs now being supported on this site, and it can therefore no longer reasonably considered an 'employment' site.</li> <li>4. Conversion to residential use would provide significant social, environmental and economic benefits.</li> <li>5. In compliance with the adopted UDP and subsequent emerging Policy documentation, any proposed residential redevelopment would consist of high quality architectural design with all new buildings conforming to modern, sustainable methods of construction and which would minimise carbon emissions during both the construction phase as well as during subsequent occupancy.</li> </ol>	Support for the allocation.
R027/C097b	GLA	Site 8 Leyton Road Centre, Colliers Wood	The site appears to be within 50 metres of London Underground tunnels and infrastructure therefore London Underground Infrastructure Protection must be consulted.	The text in the site allocation will be amended to refer to the requirement.
R068/C255	Thames Water	Site 80 Crusoe Road, Colliers Wood	On the information available to date we do not envisage infrastructure concerns regarding potable water and potable wastewater capability in relation to this site.	The text will be amended in accordance with the suggestion as follows: "Thames Water have assessed the water/wastewater capacity locally and do not envisage infrastructure concerns relating to potable water supply or wastewater services."
R001/C001	Arul.T	Site Proposal (Previous stages) - Rose Avenue Mitcham	<p>I am writing to you as I would like information on the proposed use of the site listed recently at the green area at Rose Avenue Mitcham.</p> <p>My questions and concerns are :</p> <ol style="list-style-type: none"> <li>1. Will the properties have back gardens and if so, will the current gardens be overlooked?</li> <li>2. The proposed development: will these be social housing? I have been told by an estate recently that our street's prices are affected by the high level of social housing.?</li> <li>3. We have several styles of house on this street, will the design unify the street (currently a mish mash) or will the houses be in keeping with the ones here at the moment?</li> <li>4. Will I still be able to walk from Rose avenue to the Figges Marsh without having to go back down Lavender avenue i.e will it retain the pathway?</li> <li>5. While the work is carrying on, will we have to go through disruption ?</li> </ol> <p>NB: we have lost at least two months this year to major works?</p> <ol style="list-style-type: none"> <li>6. We already have a unruly element in the area, we hope that this will be a consideration?</li> <li>7. What about traffic, we have so little parking and it has taken along time for us to gel as a community./street.</li> </ol> <p>I may be premature in my concerns but I had to send this quick email to you. I would like to know before agreement is passed. In principle, no one is against the building but the above concerns are real and I feel will help keep our street a long awaited nice place to live.</p>	<p>Point 4 – Merton's Transport Policy actively promotes walking and cycling. Therefore the Council would seek to maintain existing linkages within any new development. Although how this would be achieved would be subject to a detailed planning application coming forward.</p> <p>Point 5 – The council would not expect this development to cause any more disruption than comparable sized sites elsewhere. Construction impacts would be managed through the use of appropriate planning conditions.</p> <p>Point 7 – The scale of development that could be delivered on this site is unlikely to generate a significant impact. The level of on-site parking provided would be dictated by the council's maximum parking standards as defined in the London Plan.</p>

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R001/C001	Arul.T	Site Proposal (Previous stages) - Rose Avenue Mitcham	<p>I am writing to you as I would like information on the proposed use of the site listed recently at the green area at Rose Avenue Mitcham.</p> <p>My questions and concerns are :</p> <ol style="list-style-type: none"> <li>1. Will the properties have back gardens and if so, will the current gardens be overlooked?</li> <li>2. The proposed development: will these be social housing? I have been told by an estate recently that our street's prices are affected by the high level of social housing.?</li> <li>3. We have several styles of house on this street, will the design unify the street (currently a mish mash) or will the houses be in keeping with the ones here at the moment?</li> <li>4. Will I still be able to walk from Rose avenue to the Figges Marsh without having to go back down Lavender avenue i.e will it retain the pathway?</li> <li>5. While the work is carrying on, will we have to go through disruption ?</li> </ol> <p>NB: we have lost at least two months this year to major works?</p> <ol style="list-style-type: none"> <li>6. We already have a unruly element in the area, we hope that this will be a consideration?</li> <li>7. What about traffic, we have so little parking and it has taken along time for us to gel as a community./street.</li> </ol> <p>I may be premature in my concerns but I had to send this quick email to you. I would like to know before agreement is passed. In principle, no one is against the building but the above concerns are real and I feel will help keep our street a long awaited nice place to live.</p>	The site is designated as open space. The site allocation was removed prior to Stage 2a consultation in June 2012.
R089/C427	Internal	Sites - All	change "sites and policies DPD" to "sites and policies plan"	The amendment has been made.
R068/C256	Thames Water	Sites - General	<p>Thames Water do not object to the sites in principle, but have undertaken an assessment of the existing water supply and sewerage/wastewater capacity. Where insufficient spare capacity has been identified to service the proposed development, Thames Water would require the necessary water supply and sewerage/wastewater infrastructure is provided in time to service the development in accordance with Policy DM F2 ix).</p> <p>The attached table provides site specific comments from desktop assessments, but more detailed modelling may be required to refine the requirements.</p> <p>Thames Water would welcome the opportunity to work closer with Merton and neighbouring councils to better understand phasing proposals and the potential impact on both our water and waste networks.</p> <p>Proposed Change</p> <p>Add an informative to the identified sites setting out that Thames Water have identified there is insufficient spare capacity to service the development (as per the attached table) and that it will be necessary for the developer to discuss with Thames Water how capacity will be provided in time to serve the development in accordance with Policy DM F2 ix).</p>	Agreed. Emerging policy DM F2 outlines the requirements for new developments with respect to water and wastewater infrastructure. The policy has been developed and amended in consultation with Thames Water. Information has been added to the sites as Thames Water requested.
R023/C071	Environment Agency	Sites - General and Sites 5 Colliers Wood Community Centre, 37 Wimbledon Greyhound Stadium, 70 Haslemere Terrace	Most of the allocated sites except for sites 37, 70 in Flood Zone 3a/3b; and site 5 in Flood Zone 2 are outside of the fluvial floodplain.	The comments are noted.
R045/C154	Mitcham Cricket Green Community and Heritage Group	Sites - other	14. We have identified two additional sites for consideration: Hallowfield Way / La Sporta Hall – for economic and community uses respectively; Canons former car park – an important area of open space between the listed mansion houses of Park Place and the Canons which has been identified as a potential site for the Mitcham Local Care Centre or for housing. We believe this should be retained as open land as part of a wider rediscovery of the cultural and historic importance of the Canons grounds	These sites are not allocated in the Sites and Policies Plan.
R001/C001	Arul.T	Sites (General)	Concerns regarding land at Rose Avenue.	The "Land at Rose Avenue (formerly Site 13)" site was removed from the Sites and Policies Plan following Stage 2 consultation in early 2012.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R081/C354	Wimbledon Society	Sites 21 Birches Close and 53 Brookouse, Mitcham	1-7 Birches Close & 1A Cricket Green; sites 21 & 53: pages 262 & 270: These sites face onto the Cricket Green, an area that whilst not in the immediate area of Wimbledon, nevertheless has a very significant history in Merton, including that of the evolution of the birth of Cricket. The present Cricket Pavilion is separated from the actual playing pitch by the very busy A239 (also called Cricket Green). This arrangement might have been acceptable in past years, but is now far from ideal with modern traffic conditions. These two sites 21 & 53 face onto the cricket pitch, and are separated from it by a very much quieter cul-de-sac. Might this present an opportunity to provide a new Pavilion on their road frontage, (with suitable development at the rear), and develop the then vacated existing Pavilion in due course?	Not taken forward. The council has not received any information to suggest that the existing cricket pavilion should be redeveloped. The site is currently leased by the cricket club who intend to remain on the site. The existing cricket pavilion is a locally listed building and therefore has existing policy restrictions on redevelopment. As a result, the suggestion made is not being considered as part of the Sites and Policies Plan.
R023/C074	Environment Agency	Sites 37 Wimbledon Greyhound Stadium and 70 Haslemere Terrace	In our initial response (SL/2006/100135/SL-01/PO2), we noted that these sites are not suitable for residential development and that we do not believe that any mitigation measures can address the issues associated with the functional floodplain and the critical drainage areas. We had a meeting with the council planners to map way forward and also pre-application discussions with both the council and consultants concerning the redevelopment of the Wimbledon Greyhound Stadium site for continued sporting/recreation use.	The comments are noted. The Environment Agency have since clarified (letter September 2013) that they no longer support their initial statement repeated here.
R023/C072	Environment Agency	Sites 37 Wimbledon Greyhound Stadium and 70 Haslemere Terrace	The web based Planning Practice Guidance to the National Planning Policy Framework Table 1: Flood zones and Table 3: Flood risk vulnerability and flood zone 'compatibility' explains on Zone 3a - high probability that appropriate uses would include the more vulnerable uses and essential infrastructure should only be permitted in this zone if the Exception Test is passed. The inserted text would fit in Flood 3a and be in line with National Planning Policy Framework paragraph 100 which states inter -alia that " Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere". This is the case with sites 37 (Wimbledon Greyhound Stadium) and 70 (Haslemere Industrial Estate). It's in our interest for sites such as Wimbledon Greyhound Stadium to be redeveloped if redevelopment can provide an overall reduction in flood risk.	The comments are noted. As stated, the site allocations appropriately reference the published flood risk and that appropriate mitigation will be required and is subject to policy, evidence and consultation.
R023/C073	Environment Agency	Sites 37 Wimbledon Greyhound Stadium and 70 Haslemere Terrace	We would advise the council to review the SFRA to re-examine the extent of FZ3b. It may be the case that these sites should never have been designated Flood Zone 3b in the first place – which the SFRA did without consideration of the existing development (businesses/residences on site)	Noted. The SFRA was prepared in conjunction with and signed off by the Environment Agency. The Environment Agency have since been asked whether or not strategic flood risk modelling now excludes buildings, and to provide additional modelling or other information that now leads them to believe that the sites should never have been designated flood zone 3b.
R049/C158a	National Grid	Sites 37, 50, 59, 75, 78.	National Grid appreciates the consideration of issues highlighted in our previous consultation in relation to sites 37, 50, 59, 75 and 78. We note that site 50 appears to have been omitted from the Submission Plan, if this is not the case please advise. In terms of the sites 37, 59, 75 and 78 we acknowledge and support the reference to the relevant National Grid assets and associated issues stated in the site proposal briefs for sites 37, 59 and 75. It is however noted that the site proposal brief for site 78 does not contain any reference to the underground cable which runs along the front boundary to Western Road. We therefore request that the site proposal brief makes reference to the presence of this cable as has been done for site 59.	The text has been amended in accordance with the suggestion for Site 59. All other comments are noted and are general support for the allocations.
R010/C033	Congrave J	South Wimbledon Station	By making better use of their sites they can make a lot of money and at the same time make areas like South Wimbledon much more attractive areas to live in , which would stimulate further regeneration .	The text has been amended in accordance with the suggestion for Site 59. All other comments are noted and are general support for the allocations.
R010/C030	Congrave J	South Wimbledon Station	Currently it is a rather grubby , concrete , single storey building standing on a prime piece of real estate , with its image dragging the whole area down.	The text has been amended in accordance with the suggestion for Site 59. All other comments are noted and are general support for the allocations.
R010/C031	Congrave J	South Wimbledon Station	Simply cleaning up the building would have little effect , a complete overall is required , and this can only be paid for by development on that site above the station .	The text has been amended in accordance with the suggestion for Site 59. All other comments are noted and are general support for the allocations.
R010/C029	Congrave J	South Wimbledon Station	South Wimbledon cannot be regenerated without a major revamping of this site , as it is the focal point for the area and the first thing people bring to mind when thinking of this part of the borough.	The text has been amended in accordance with the suggestion for Site 59. All other comments are noted and are general support for the allocations.
R010/C032	Congrave J	South Wimbledon Station	TFL are simply not making the most of their extensive property portfolio on behalf of London residents .	The text has been amended in accordance with the suggestion for Site 59. All other comments are noted and are general support for the allocations.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R010/C028	Congrave J	South Wimbledon Station	There appears to be a major omission in the plan as the re-development of SOUTH WIMBLEDON UNDERGROUND STATION is not included as a potential site	The text has been amended in accordance with the suggestion for Site 59. All other comments are noted and are general support for the allocations.
R014/C045	Crest Nicolson South	Polices Map	The eastern edge of the site is currently allocated for open space however the boundary line drawn for the open space designation on the Draft Policies Map is incorrect as it does not reflect the current boundary of the latest planning permission (ref 11/P1509). We would therefore be grateful if the boundary line could be amended to reflect the attached approved layout	Agreed change. Officers to ensure this boundary reflects the latest layout and if not, amend the boundary accordingly.
R014/C044	Crest Nicolson South	Polices Map	We act for Crest Nicholson South in respect of the former Rowan School, Rowan Road. The site is currently under construction with the majority of the development now completed. The extract below shows the site's location.	Noted.
R089/C435	Internal	Policies Map	Add Car Parking Zones in Policies Map	sent email to Leo Morris and wait reply - should reprint all the policies map check if he send this: A:\GISData\Topography\Vector\Highways\CPZs
R089/C434	Internal	Policies Map	Additional route in Atkinson Morley	New tab is created for post amendments for cycling - not export for B1 yet and it has printed out (B1 Wimbledon)
R089/C433	Internal	Policies Map	Mitcham TC Junction - Increase the size in the map to include the TC (11tn) p246	Done and printed out
R089/C428	Internal	Policies Map	Myrna Close O/S, SINC:Retain SINC boundaries. Amend open space boundary to match Thames Water operational land, correct drafting error. Private inaccessible site.	MO15 - Changed and saved on post submission open space tab
R089/C429	Internal	Policies Map	Poplar School Open Space:increase open space - Include the two access roads in the open space	MO51 - Add two access roads and saved on same tab as the above
R089/C430	Internal	Policies Map	Proposed Designated Industrial Area: This map was included in all the other stages of this document but excluded from Stage 4 - not sure if there was a reason for this.	Proposed Designated Industrial Areas
R089/C432	Internal	Policies Map	Ravensbury Park SINC (Ref. MeBII15):This boundary might change subject to the decision of the London Wildlife Sites Boards at their 15 October 2013 meeting, to validate the officers' recommendation.	No changes eventually
R089/C431	Internal	Policies Map	Shopping parades:This map should show the difference between the Wimbledon shopping frontage, core shopping frontage, secondary shopping frontage and also show the primary shopping area as well as the town centre boundary.	Town Centres with Frontages categorisation.
R081/C335	Wimbledon Society	Policies Map - Conservation Areas etc	Maps of Conservation Areas etc: pages 363/4/8: The Legend should also have a note explaining the significance of the numbers: Red numbers relate to the Conservation areas list on page 162: Unclear what the black numbers (?Archaeological Priority Zone Policies?) indicate: see page 171.	Thank you for your comments, we will update the legend and add a phrase to link the numbers to the areas.
R005/C018	Bellamy J	Policies Map - Conservation Areas etc	Page 363: Morden Park mansion , 'as massively. renovated a few years ago, although its service building and surrounding, landscape have been lost or debased. Could some attempt be made to revive its picturesque quality as a 'set piece'?	Noted. Morden Park is a designated conservation area.
R055/C181(b)	RESIDENTS' ASSOCIATION OF WEST WIMBLEDON	Policies Map - General	• East/West walking route to connect two sections of Cottenham Park Road. Shown on map with dotted blue line (proposed cycle route). This is a well-used pedestrian and cycle route towards St. Matthew's School and Coombe Lane bus services. CORRECT MAP.	This appears to relate back to legend description for former green corridors - legend to be modified accordingly.
R081/C336	Wimbledon Society	Policies Map - General	the inclusion of mapping for the surrounding Boroughs is helpful, but the shading could be lightened in the finished document, much as it was in the UDP Proposals Map of 2003, to ease readability.	Thank you for your comment. The adopted maps will be of high clarity
R081/C338	Wimbledon Society	Policies Map - General	The key panels showing MOL as pure green colour need to have the vertical hatching added, to match that shown on the actual maps. The Key Panels have wide spaced vertical and horizontal hatching for Open Space and for Green Corridor that does not appear to match the close hatching on the maps: They should be identical. Site W007 on page 309 has the hatching, but not the green colour.	Thank you for your comment. Green solid colour is MOL and Rookwood Open space (W007) is not MOL site. Green Vertical lines is Open space and green horizontal is green corridors. We will improve the legend in order to match the map.
R081/C337	Wimbledon Society	Policies Map - General	Wimbledon Page numbers (need updating) – 328/329/330/331/332, Raynes Park Page numbers - 308/309 (The same comments apply to the maps for Mitcham, Morden, Colliers Wood).	Thank you for your comment. We had some technical troubles while printing the document and the page numbering collapsed. We will renumber the document.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R055/C181a	RESIDENTS' ASSOCIATION OF WEST WIMBLEDON	Policies Map - Green Corridors	Copse Hill Conservation Area. Shown as MOL (Green). Open Space Policy (grey vertical hatching). This area is also subject to Green Corridor Policies (green horizontal hatching) CORRECT MAP.	Green Corridors are relatively continuous areas of green space and although small discontinuities, such as division by a road, are allowed, larger gaps are fatal. The area was not part of the green corridor on the 2003 Proposals Map and, in reviewing green corridors as part of the <i>Sites and Policies Plan</i> , it was the council's view that the separation distance from the nearest other green corridors were considered to be too great.
R005/C019	Bellamy J	Policies Map - Green Corridors	Green Corridors: it is noted with concern that it is proposed to remove Lower Green West, the Parish Churchyard and the grounds of public institutions along Church Road from Green Corridor status. It should be recognised that the visual and ecological cohesion of this swathe, especially the mature trees, extensive grassed areas, shrubberies, hedgerows, etc. combined with the pedestrian accessibility of Love Lane and Church Path, give the area substantial coherence.	Green Corridors are relatively continuous areas of green space and although small discontinuities, such as division by a road, are allowed, larger gaps are fatal. As part of reviewing green corridors for the <i>Sites and Policies Plan</i> , it was clear that although the sites between the London Road Playing Field and Church Road had numerous mature trees, areas with undergrowth and maintained lawns, it also had numerous large buildings and terraced housing with much hard standing and tarred roads. This broken patchwork of natural surfaces, combined with the fact that Church Road and London Road (A217) are very busy roads, makes this area unsuitable for protection for species migration. It is the council's view that the separation distance between the Mitcham Parish churchyard and the nearest other green corridor is considered to be too great.
R005/C017	Bellamy J	Policies Map - Green Corridors	Links between The Canons and Park Place and the former News of the World Sports Ground : it is noted with relief that the recognition of this swathe as a consolidated area of open space has been achieved.	Noted with Thanks
R089/C436	Internal	Policies Map - Legend	Change the legend for policies maps: Wimbledon to Morden/Sutton Light Rail Policies (06TN) to Wimbledon to Morden/Sutton Tram Extension (06TN)	Legend has been amended and saved in the same link with the above
R005/C020	Bellamy J	Policies Map - Mitcham Town Centre	Mitcham Town Centre: Langdale Parade: whilst it is recognised that small sites are not shown in file main planning documents now under consideration, nevertheless, the detached sliver of Fair Green comprising the frontage of Langdale Parade is of such historic and environmental significance (especially since it accommodates major lime trees) that it should be shown as an open space element, as is the main area of Fair Green, in the various maps of the Plan Langdale Parade Green has been under much pressure for indiscriminate erosion for paving, vehicle access, etc. in recent years,(The map379 shows the location of the Parade but does not afford its greenspace any status.)	The three small soft landscaped areas, which respectively measure 121sqm, 546sqm and 63sqm, have 7 mature trees on it that are maintained by the council. Each portion is totally surrounded by adopted highway and has no sport or recreation functionality. Minor highways works (such as pavement and other road works) are often carried out without the need for planning permission and therefore their designating as open space would not protect them from further road and pavement works. Open space designations have no impact on the protection of trees. Designating highways land does not conform to the NPPF definition of open space and it is unlikely that policy DM O1 will effectively protect the small soft landscaped portions of land. It should however be noted that this area is very likely to be identified as a 'significant group of trees' and a 'significant green space' (from an area character assessment perspective) in the forthcoming Mitcham part of the Borough Character Study referred to in paragraph 5.12 of policy DM O1.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R055/C182	RESIDENTS' ASSOCIATION OF WEST WIMBLEDON	Policies Map - MOL i3	The garden forms part of the green corridor east/west Cottenham Park Road. The house was built on MOL. RETAIN MOL STATUS.	<p>The council approved planning application 08/P1163 after the Secretary of State considered the case but decided not to intervene. The officers report included the following paragraph:</p> <p><i>"1.5 The side garden at 37 Oakwood Road, which forms the current proposal site, has been wrongly designated as MoL. This parcel of land was purchased by the applicant over 30 years ago and the Council acknowledges that a drafting error occurred in the subsequent UDP proposals map. This error only became apparent to the Council and the applicant following the grant of planning permission in 2007 for a new attached dwelling house (07/P2780). The Council has agreed that this parcel of land should be re-designated as part of the LDF process so that no part of the garden land at 37 Oakwood Road is shown as being MoL. This technicality does not inhibit the Council in terms of being able to make the recommendation now, provided that correct procedure is followed to refer the application to GoL"</i></p> <p>Furthermore, the house and boundary fence has since been erected and therefore the retention of the existing (2003 Proposals Map) boundary alignment would be contrary to the following two criteria for Green Belt (MOL) boundary determination in paragraph 85 of the NPPF: "not include land which it is unnecessary to keep permanently open" and "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent". The latter being relevant because the existing MOL boundary cuts diagonally through the new house and its garden area. The inclusion of the residential property will not conform to the council's open space criteria and therefore the open space boundary should also be aligned with the existing property boundary.</p> <p>For Information - the subject area/amendment measures 200sqm</p>
R081/C340	Wimbledon Society	Policies Map - Open Space	<p>Page 332: The Galustian Garden, off St Mark's Place, which was shown in previous maps as a designated open space (which it is), does not appear to have been identified as such on the current Proposals Map: This should now be added. It is important that this is said as the Council has a direct control over the future of this site as owner, not merely as a planning authority.</p> <p>Also, the Council has in the past (1980's) given a formal public undertaking that it would provide a replacement for the Civic Hall, which was to be demolished at that time, although no subsequent Council has taken steps to deliver on this pledge.</p>	The Galustian Gardens are (still) proposed as open space, as is evident by its listing as site M083 in table B.5 'All Other Open spaces' on page 157. Due to the scale of the printed extract of the Policies Map on page 332, this small site has unfortunately been covered by its reference number.
R081/C339	Wimbledon Society	Policies Map - Open Space	<p>Page 332: The private open green area fronting Eagle House in the Village High Street could be shown as an open space.</p> <p>It is in full public view from the High Street, behind listed walls/railings. It forms an important part of the local street scene, and contains a number of substantial trees.</p> <p>It is of comparable size to the Galustian Garden off St Mark's Place, which is also a designated private open space, although largely hidden from the public view.</p>	Not taken forward. This approximately 1000sqm area of private space does not meet the criteria for open space ('very small areas'). The space in front of the building makes a positive contribution to the setting of the listed building and its contribution to this part of Wimbledon Village will be considered as part of the borough-wide Character Assessments that are currently underway.
R089/C437	Internal	Policies Map - Page 246	Remove Site 34 from the policies map.	The amendment has been made.
R089/C438	Internal	Policies Map - Site 05	Spelling and grammar.	Amend text.
R089/C439	Internal	Policies Map - Site 48	Amend site description. Spelling and grammar.	Amend text.
R045/C144	Mitcham Cricket Green Community and Heritage Group	Policies Map - Wandle Valley Regional Park	17. It is helpful to have the boundaries of the Regional Park accurately defined in the development plan. We support the majority of the proposed changes in and around Cricket Green, including the Methodist Church, obelisk, Canons Leisure Centre, Canons Lodge, Vestry Hall and Fire Station.	Noted with thanks

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R045/C145a	Mitcham Cricket Green Community and Heritage Group	Policies Map - Wandle Valley Regional Park	18. We do not agree with the proposed exclusion of the Cricketers pub site from the Wandle Valley Regional Park. The rationale has been overtaken by events with rejection of the two recent appeals for residential use. Its inclusion would be consistent with the designation of the island site proposed above and the inclusion of both the Vestry Hall and Fire Station.	Agree with the principle of including the Cricketers. Both recent appeal decisions (10/P1909 - APP/T5720/A/11/2145477 and 11/P3229 & 12/P2084 - APP/T5720/E/12/2183656) were dismissed solely on matters of design. Subsequently as fresh planning application (ref. no. 13/P1077) has been submitted for the change of use (conversion) of the of the public house into 7 x self-contained flats, without an associated application for Conservation Area Consent for the demolition of the pub. Although the statutory expiry date for this application was 10/07/2013, it is yet to be determined. It is therefore clear that it is still the owner's intention to develop the site for residential purposes and that the council has no intention of allocating the site for any other purposes (refer to response reference R045/C145(b)). The Wandle Valley Regional Park Trust Board response states that they are "in general agreement with the location of the WVRP boundary as shown in the Stage 3 Policies Map consultation document and agree with the officer's recommendations regarding the inclusion and exclusion of the specific portions listed. In relation to general themes, we agree that private residences on the boundary of the park should be excluded unless they are regarded as a heritage asset and/or within a Conservation Area". This site is listed as no 41 on page 387 in the Stage 3 document where it is recommended to be excluded, however that document does not point out that this site is in the Wandle Valley Conservation Area. The council is therefore now recommending that this site be included in the WVRP boundary because, as reasoned for other similar sites and in accordance with the Regional Park Trust Board's comments, although a residential use is usually not ancillary to the park's use, this building is within the Wandle Valley Conservation Area and therefore its inclusion would be in accordance with the objectives of the Wandle Valley Area Framework (Enhanced Visitor Offer and Local Distinctiveness).
R024/C382	Internal	Policies Map - Wandle Valley Regional Park	The Submission Draft Policies Map does not reflect the comments from the Wandle Valley Regional Park Trust Board, as expressed in their letter dated 15 June 2013 in response to the Stage 3 consultation on the final draft proposals. The Policies Map needs to be amended to ensure that these comments are incorporated.	The council accepts all the Wandle Valley Regional Park Trust board's recommendations and have now amended the Policies Map accordingly.
R005/C021	Bellamy J	Policies Map - Wandle Valley Regional Park	Wandle Valley Regional Park : It is noted with satisfaction that Lower Green We will be included in the demarcation of the Wandle Valley Regional park, bringing it into line with the other Greens of Lower Mitcham. In this context, the allotment areas of the National Trust holding at Morden Hall Park, whilst lacking the visual quality of the remainder of the National Trust estate, nevertheless warrant inclusion in the Regional Park, being a significant recreational and environmental amenity.	As is evident from the maps on page 246 and 283, the allotments listed in table B.2 'Allotments and Urban Farms' as A015 'Phipps Bridge Allotments' are within the Wandle Valley Regional Park (WVRP). The (green) MOL land to the north of these allotments that is not with the WVRP boundary is private residential garden land.
R066/C207	Sutton Council	Policies Map - Wandle Valley Regional Park	We are slightly surprised that there are no defined boundaries for the Wandle Valley Regional Park within the document, especially as Paragraph 15.9 of the Merton Core Strategy states: "The final boundary will be set following the recommendations of the Wandle Valley Regional Park Development Board, comprising the local authorities along the Wandle. Once agreed, it will be integrated into the next review of Merton's Proposals Map." As you are aware, the London Borough of Sutton defined the boundaries of the Wandle Valley Regional Park within its area in 2009. We consider it would be useful if all of the boundaries of the Wandle Valley Regional Park were designated relatively quickly as we believe a defined Wandle Valley Regional Park would encourage the leveraging of funding and encourage local initiatives. We would welcome a clarification of when the London Borough of Merton intends to define its Wandle Valley Regional Park boundaries.	The defined boundary is shown on the draft Proposals Map with a diagonal green hatching but note the amendments referred to in response R024/C382.
R068/C215	Thames Water	Policies Map B3	Map B3 – Colliers Wood – Thames Water Fortescue Road Site - Objection Thames Water objects to the open space designation MO15 covering its depot on Fortescue Road and consider that it should be deleted (please see attached site plan). It is understood that Merton Council propose to make the amendment as suggested and that the designation is a drafting error which will be amended. Proposed Change Remove the open space designation MO15 from Thames Water's Depot on Fortescue Road. It is understood that the designation is a drafting error and when it is removed Thames Water will withdraw this objection.	Agreed. Under Schedule 2, Part 17, Class E of the GPDO, a statutory undertaker such as Thames Water could cover the whole site with hard standing and plant or machinery as long as it is not higher than 15m, they can erect small (29m3) buildings and can extend existing buildings by <25% in volume or <1000m2 in floor area. As these rights are so extensive, policy DM O1 will not be effective on this land and therefore the council is proposing an amendment proposed open space boundary of site M015 'Myrna Close Open Space', which pulls the open space designation back to the Thames

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
				Water site boundary, thereby reducing the proposed 2.514ha open space area by 0.915ha.
<b>R068/C216</b>	Thames Water	Policies Map B3	<p>Thames Water support the removal of the Wandle Valley Regional Park designation from the Thames Water Sewage Pumping Station site at Byegrove Road, Colliers Wood.</p> <p>There is currently no public access to the Thames Water operational Sewage Pumping Station site for health and safety and security reasons. The site incorporates significant built development including a number of sewage pumping station buildings and two sets of large concrete storm tanks and is not deemed appropriate for Regional Park designation or public access.</p> <p>Thames Water consider that the Pumping Station site at Byegrove Road should be identified as an existing Major Developed Site (MDS) in the MOL in accordance with paragraph 89 of the National Planning Policy Framework (please see attached site plan). The London Plan confirms that Green Belt policy applies to MOL. Paragraph C1 of Annex C to PPG2 Green Belts, 1995, clearly identified water and sewage treatment works as being major developed sites.</p> <p>The Thames Water Byegrove Road site measures approximately 1.35 hectares and incorporates significant built development including a number of buildings and two sets of large concrete storm tanks.</p> <p>Proposed Change Designate the Thames Water Sewage Pumping Station site at Byegrove Road, Colliers Wood as an existing Major Developed Site (MDS) in the MOL</p>	<p>On page 285 of the consultation document for the final draft of the Policies Map (Stage 3) the following officer's recommendation is made with regards to this site: "Include: Wandle Valley Sewage Works - only approximately 25% of the site (along the eastern boundary) is not designated as MOL and the whole site is within Flood zone 2 (1in100 - 1in1000 years). The inclusion of this site would be in accordance with the objectives of the WVAF (Managing Flood Risk and Urban Heat Island)." (WVAF is Wandle Valley Area Framework)</p> <p>Paragraph 15.9 of Merton's Core Strategy states: "The map below proposes indicative boundaries for the park. The final boundary will be set following recommendations of the Wandle Valley Regional Park Development Board comprising the local authorities along the Wandle. Once agreed, it will be integrated into the next revision of Merton's Proposals Map."</p> <p>The Wandle Valley Regional Park Trust Board response states that they are "in general agreement with the location of the WVRP boundary as shown in the Stage 3 Policies Map consultation document and agree with the officer's recommendations regarding the inclusion and exclusion of the specific portions listed." The only matters on which they disagreed are not relevant to this site.</p> <p>The council accepts all The Board's recommendations but the Submission Draft of the Policies Map does accurately reflect boundary that The Board has approved. With reference to response R024/C382, this site will now be included for the reasons given in the Stage 3 consultation document. Refer to R068/C214 for the response regarding the proposed designation of the site as a Major Developed Site (MDS) in the MOL</p> <p>R024/C382</p>
<b>R073/C276</b>	Waitrose	Policies map C1	Waitrose supports the proposed boundary of Raynes Park Local Centre insofar as it includes the Waitrose store.	Noted with thanks
<b>R069/C266</b>	The Co-operative Group	Policies Map C2	<p>Draft Policies Map Morden C2 and policy DM R1: Location and scale of development in Merton's town centres and neighbourhood parades. The objection is based on:</p> <p>The existing Co-operative store should be identified as a mixed use development site (A1 to A5, D1 and D2 Uses); and</p> <p>The Co-operative store car park should be included within the designated neighbourhood parade.</p>	The comments are dealt with in the council's responses in R069/C263 and R069/264.
<b>R069/C263</b>	The Co-operative Group	Policies Map C2	TCG is proposing the mixed use redevelopment of the entire site, both the store and car park, with a replacement food store, additional floor space for retail, commercial and/or community uses (A1 to A5, D1 and D2 Uses) and residential floor space above. The scheme, as detailed, was discussed at a meeting on 29 March 2012 and Merton's preapplication advice (Ref: 12/p0493/New) dated 25 April 2012 confirms "in principle" support for redevelopment as the site is on a sustainable location benefitting from good public transport accessibility and pedestrian access subject to consideration of the standard and appearance of the proposed development and potential impact on the local area. These are issues that do not preclude the mixed use allocation of the site and are addressed by further policy and guidance.	Noted - no amendments to the policy are required. Ref: 12/p0493/New is a report completed after a pre-application meeting and does not represent planning permission. The applications would still need to gain planning permission before development could commence on-site.
<b>R069/C268</b>	The Co-operative Group	Policies Map C2	The emerging plan is not consistent with Merton's acceptance of the suitability of the site for redevelopment, does not best protect viability of the neighbourhood parade, meet the everyday needs of Merton's residents, make the most effective use of limited land available for development, diversify local community and complimentary uses and provide for linked trips within the parade.	Noted - no amendments are required to site allocations or to the neighbourhood parade designations. The comments are dealt with in the council's responses in R069/C263 and R069/264.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R069/C264	The Co-operative Group	Policies Map C2	The principle of redevelopment including store car park has been accepted and the proposed allocation and designated neighbourhood parade boundary should be revised to include the car park. Representations were submitted to the Sites and Policies DPD (2011) confirming the appropriateness of including the food store car park within the designation. The neighbourhood parade has been extended to include properties on the north side of Kingston Road but continues to exclude the car park.	The comments are dealt with in the council's responses in R069/C258. Also, neighbourhoods are not recognised as town centres in the National Planning Policy Frameworks definition of town centres. As detailed in the retail policies in the Sites & Policies DPD, neighbourhood parades were designated to protect the uses that serve local essential needs such as convenience shops, GP's, post offices etc ... within walking distance of local residents. It is intended for neighbourhood parades to complement designated town centres to fulfil Merton's vision of ensuring that there are local facilities within 400 meters of every resident in Merton. Neighbourhood parades were designated so that the use (that meets local needs) will not change into residential use, for instance. The UDP and accompanying Proposals Map (2003) designated addresses rather than the uses that require protection. As part of the update work, based on extensive qualitative and quantitative research, proposed neighbourhood parades were designated. As mentioned at the pre-app, for the proposed mixed use to be acceptable, an impact and sequential test were required for our consideration.
R069/C265	The Co-operative Group	Policies Map C2	The site has been accepted as appropriate for redevelopment and should be identified as a mixed development opportunity which can be delivered in 1-3 years. The designated neighbourhood parade boundary should be revised (see red line below) accordingly.	The comments are dealt with in the council's responses in R069/C263.
R089/C440	Internal	Policies Map-Page 211	Amend sites in two sub areas - remove Site 22 Patrick Doody from Colliers Wood. Remove Site 14 Taylor Road Day Centre from Mitcham. Remove Site 18 60 Pitcairn Road from Mitcham. Remove Site 80 Crusoe Road industrial buildings from Mitcham. Remove Site 15 West Barnes Library from Morden.	The amendment has been made.
R089/C441	Internal	Policies Map-Page 212	I think the 3 maps on pages 363-364 should be moved, they currently site under the heading "Wimbledon" and should be in another section of the document.	The amendment has been made.
R089/C442	Internal	Policies Map-Page 217	Spelling - add 'l' into Colliers Wood. Also amend the text location and colouring in consultation with TB. At present it covers mainly Wimbledon	The amendment has been made.
R089/C443	Internal	Policies Map-Page 243	Spelling - add 'l' into Colliers Wood	The amendment has been made.
R089/C444	Internal	Policies Map-Page 257-258	Remove Site 18 from the Mitcham subarea	The amendment has been made.
R089/C445	Internal	Policies Map-Page 286-287	Remove Site 15 from the Morden subarea	The amendment has been made.
R089/C446	Internal	Policies Map-Page 307	Spelling - add 'l' into Colliers Wood. Increase size of colouration slightly further south also (disc AW/TB) to include Site 15	The amendment has been made.
R089/C447	Internal	Policies Map-Page 327	Spelling - add 'l' into Colliers Wood. Increase size of colouration to the south east to include Wimbledon town centre and surrounds.	The amendment has been made.
R089/C448	Internal	Policies Map-Page 212	Remove Site 16 Wimbledon Library.	The amendment has been made.
R089/C449	Internal	Policies Map-Page 215	Formatting - centre text correctly	The amendment has been made.
R089/C450	Internal	Policies Map-Page 232-233	Remove Site 22 Patrick Doody from Colliers Wood subarea.	The amendment has been made.
R089/C451	Internal	Policies Map-Page 252-253	Remove Site 14 from the Mitcham subarea	The amendment has been made.
R089/C452	Internal	Policies Map-Page 279-280	Remove Site 80 from the Mitcham subarea	The amendment has been made.
R089/C453	Internal	Policies Map-Page 281	Spelling - add 'l' into Colliers Wood	The amendment has been made.

Reference	Consultation's Responder	Policy/Site	Comment	Officer Response
R045/C146	Mitcham Cricket Green Community and Heritage Group	Policies Maps - green corridors changes	15. We welcome the more inclusive approach to open space and the addition of many small sites which have previously been excluded. We do not support deletion of Lower Green West as a recognised Green Corridor – it fulfils the necessary criteria and is separated from the rest of the Green Corridor on the cricket ground only by a road. As noted in the Plan, the Mayor's Biodiversity Strategy states that "small discontinuities, such as division by a road, are allowed". In historic, physical and administrative terms, Lower Green West is an integral part of the network of local green space which connects to Mitcham Common.	<p>Not taken forward. The Mayor's Biodiversity Strategy refers to, and summarises the London Ecology Unit's Advisory Note 6: Green Corridors in London. The Mayor's Strategy states in paragraph A1.2.18 (p.119) that: "The essential tests are habitat composition and near continuity". The Advisory Note cautions that the "<i>Preparation of corridor maps imposes a black-and-white view on the actual shades of grey of the face of London</i>" and with regards to the 'continuity' criteria for green corridors advises: "<i>Terrestrial habitats are inherently more discontinuous than running water. Here the size of the gap allowed is more stringent. A common situation is a road or rail-side habitat strip cut by the tarmac of a road; here the corridor is allowed to continue, provided that the cut ends of the corridor facing each other over the gap are (no) more than a few metres wide.</i>" ('no' inserted as its exclusion appears to be a typo).</p> <p>As set out in the 2nd paragraph of page 361 of the Stage 3 consultation document: "<i>The GLA's Urban Greening and Biodiversity Officer supports the approach of a local review of Green Corridor boundaries which defines its own criteria with reference to paragraphs 1.2.17 &amp; 18 in Appendix A of the Mayor's Biodiversity Strategy (see below). He stressed that as part of the review the council should consider the importance and necessity of each portion of land to be designated as Green Corridor with regards to its central function (enabling species movement).</i>"</p> <p>This part of London Road, which separates Lower Green West from the Cricket Green, is very busy with traffic and the soft landscaping is approximately 14m apart. The soft landscaped areas on Lower Green West consists mainly of mature trees, moved lawn and maintained flowerbeds and GiGL records shows that there are no records of positive sightings of protected species on Lower Green West. London Road is considered to be a fatal barrier at this part of the green corridor and it is not apparent that Lower Green West is important or necessary to be within the green corridor. It should also be noted that, for reasons pertinent to these designations, Lower Green West is proposed to be designated as open space, MOL and within the Wandle Valley Regional Park.</p>
R081/C341	Wimbledon Society	Policies Maps - MOL	Map i3: House and Garden should remain as MOL. Page 368	Refer to response R055/C182
R045/C147	Mitcham Cricket Green Community and Heritage Group	Policies Maps - SINC	16. We welcome inclusion of St Peter and St Paul Churchyard, London Road Playing Fields, Three Kings Pond (and the addition of Commonsides Rough) and Canons Pond as Sites of Interest for Nature Conservation.	Noted with Thanks
R045/C148	Mitcham Cricket Green Community and Heritage Group	Policies Maps - SINC	We would encourage renaming the Cranmer Green Pond SINC as Cranmer Green and Pond for clarity – it covers a much wider area than the pond.	Agreed in principle, however it is likely that the 'and' will be dropped with colloquial references to the site and therefore, as agreed with Merton's Green Spaces officer, a name change to 'Cranmer Green Meadow and Pond SINC' is proposed.
R041/C132	Mayor's office for Policing	Policies Maps B2 town centre boundary	As highlighted within earlier representations the changes to the defined Wimbledon Town Centre area would result in the MOPAC/MPStraining facility at No. 22 Tabor Grove being removed from the town centre. As part of a change in service provision set out within the Estate Strategy training and education provision has been substantially reformed and there are now five regional learning centres including one at Sovereign Gate, Richmond which has replaced in full the provision at Tabor Grove. This facility will therefore be released and previous representations in relation to the town centre boundary are withdrawn.	Noted with thanks.
R049/C168	Natural England	SA	The approach and methodology used are in line with the advice that would be offered by Natural England, appropriate legislation and policies, programmes and plans have been identified in assessing the document.	Noted with thanks

R014/C045

Policies Map Submission actions to responses stage 4

Recommended boundary changes: Former Rowan High School (M076)



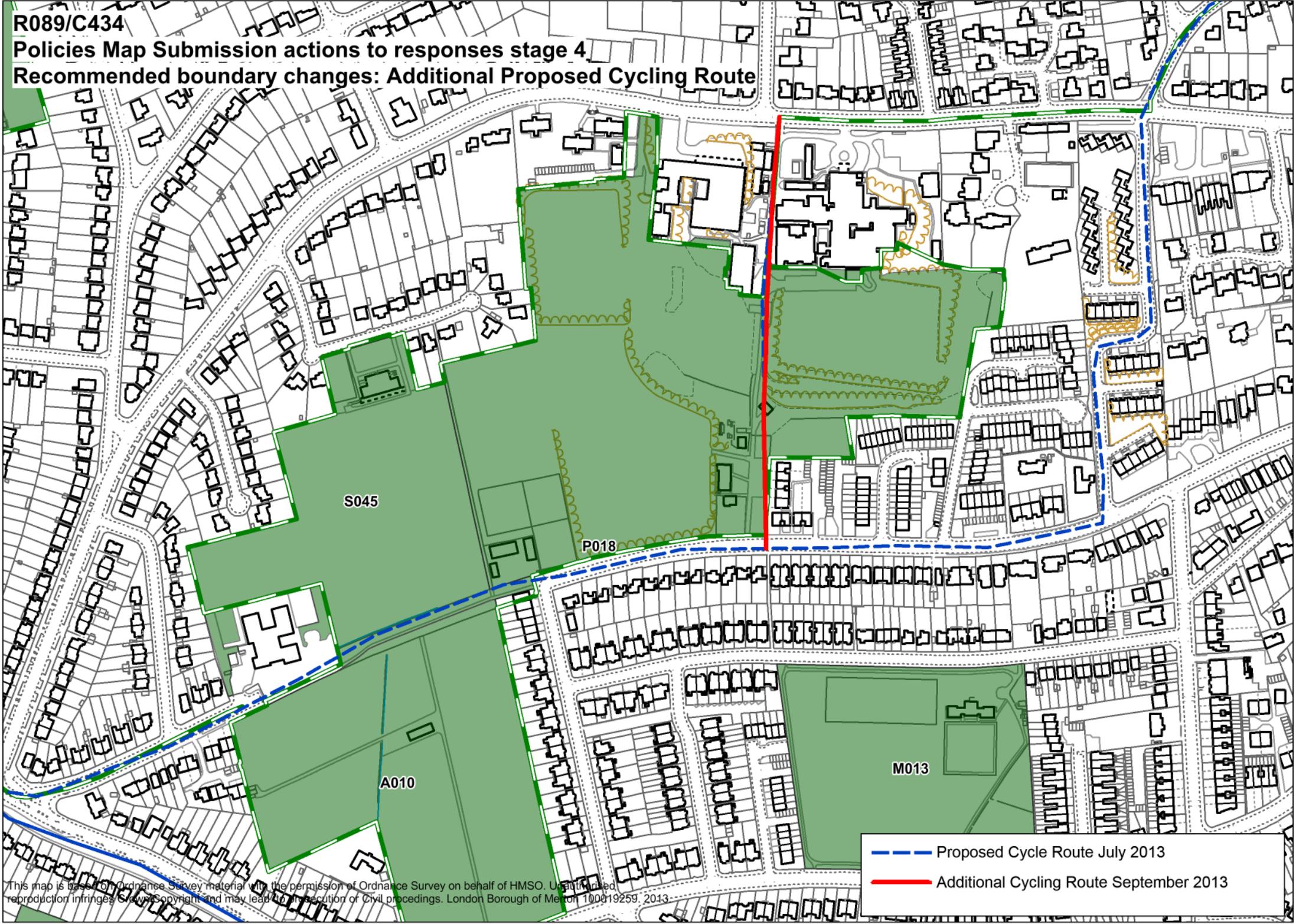
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	Open Space Proposed Change September 2013
	Open Space Submission Stage 4 July 2013

R089/C434

Policies Map Submission actions to responses stage 4

Recommended boundary changes: Additional Proposed Cycling Route



S045

P018

A010

M013

— — — — Proposed Cycle Route July 2013

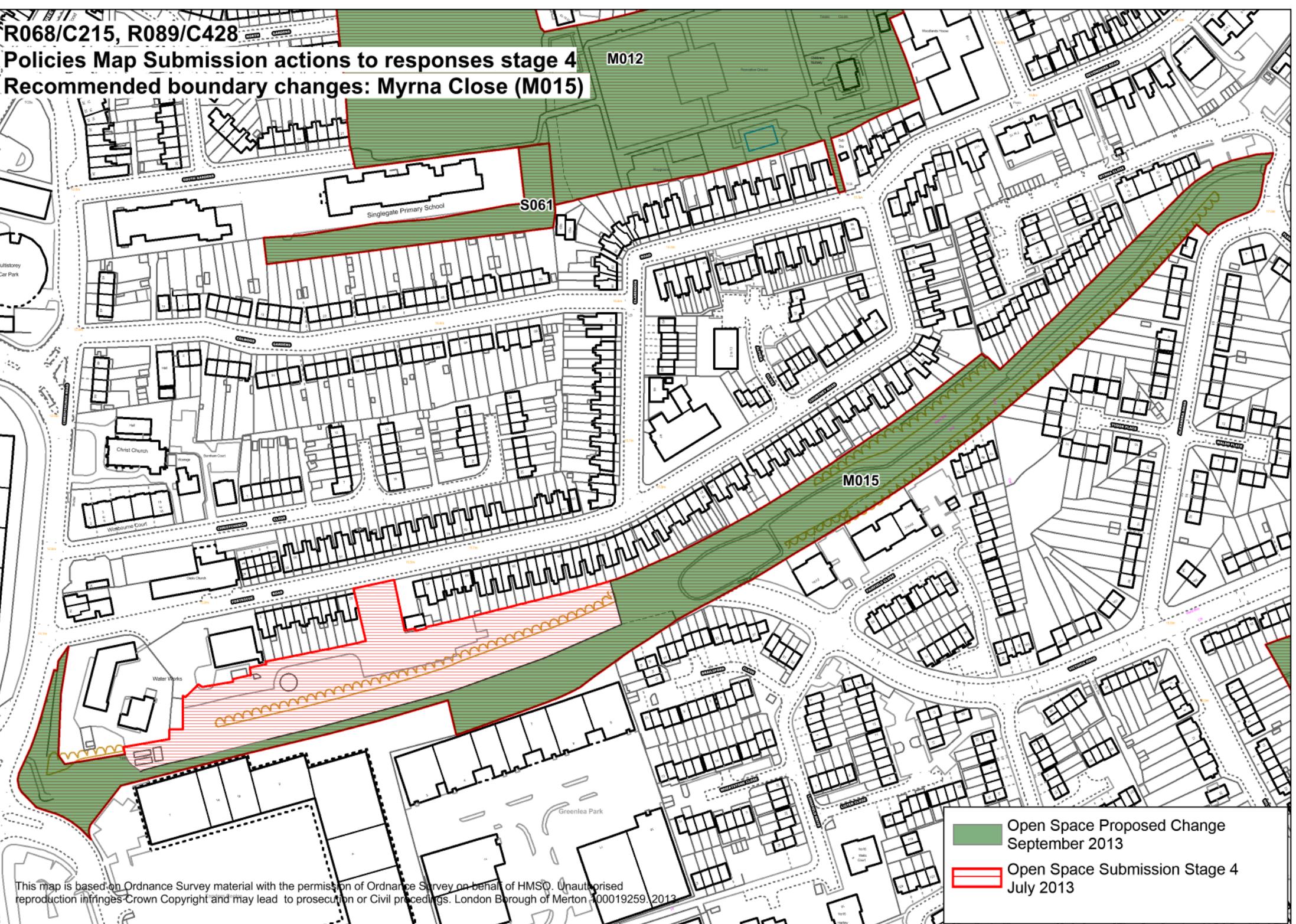
— Additional Cycling Route September 2013

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R068/C215, R089/C428

Policies Map Submission actions to responses stage 4

Recommended boundary changes: Myrna Close (M015)



Open Space Proposed Change  
September 2013

Open Space Submission Stage 4  
July 2013

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R089/C429

Policies Map Submission actions to responses stage 4

Recommended boundary changes: Poplar School (S030)



Legend:

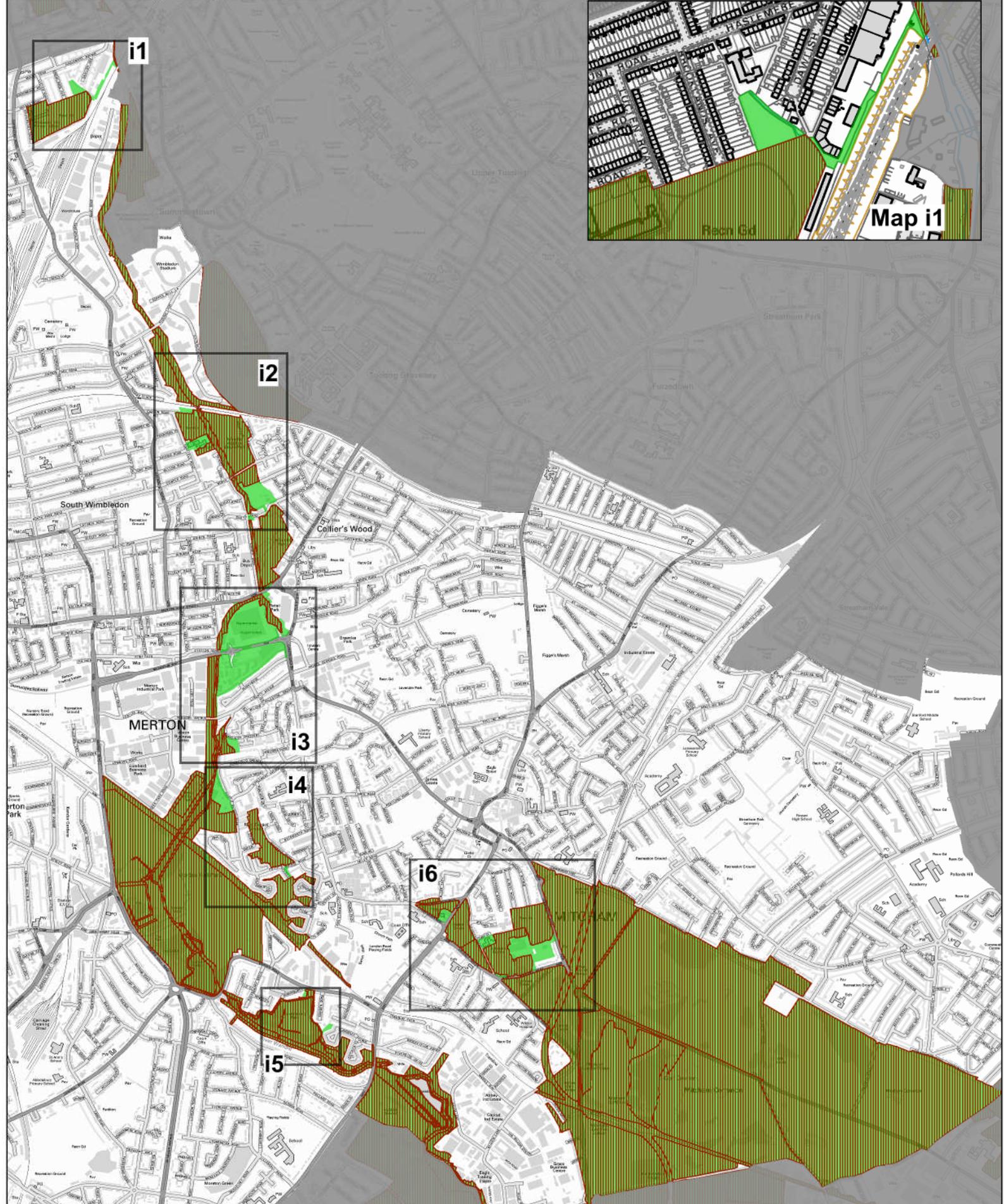
-  Open Space Proposed Change September 2013
-  Open Space Submission Stage 4 July 2013

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**Policies Map Submission Draft  
with recommended changes  
following Stage 4 responses:  
Wandle Valley Regional Park**

 WVRP Submission Stage 4  
July 2013

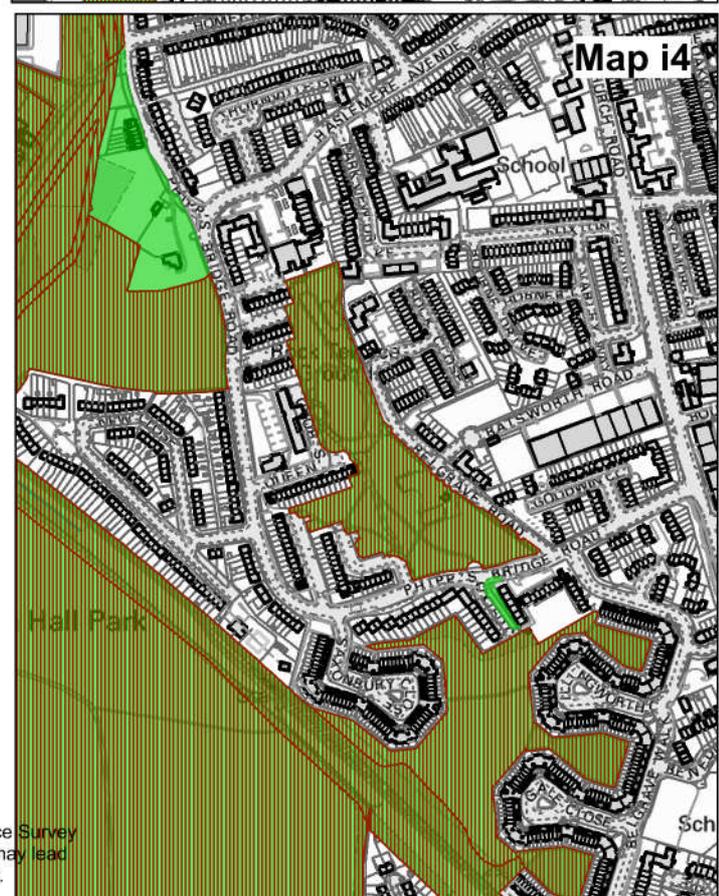
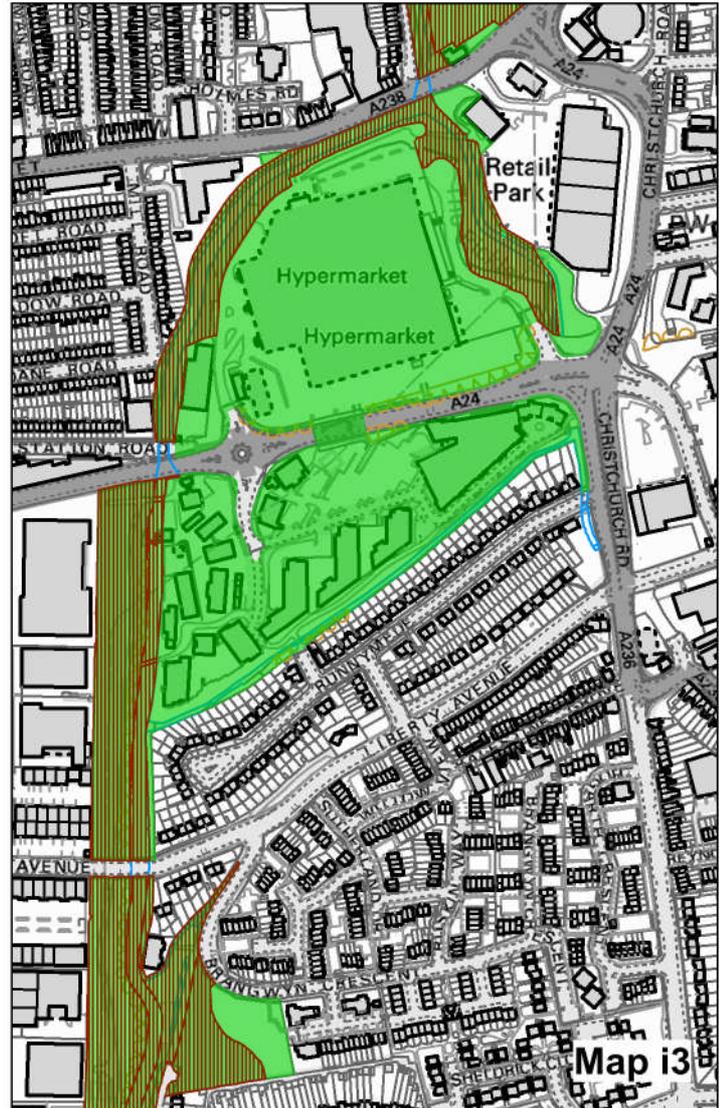
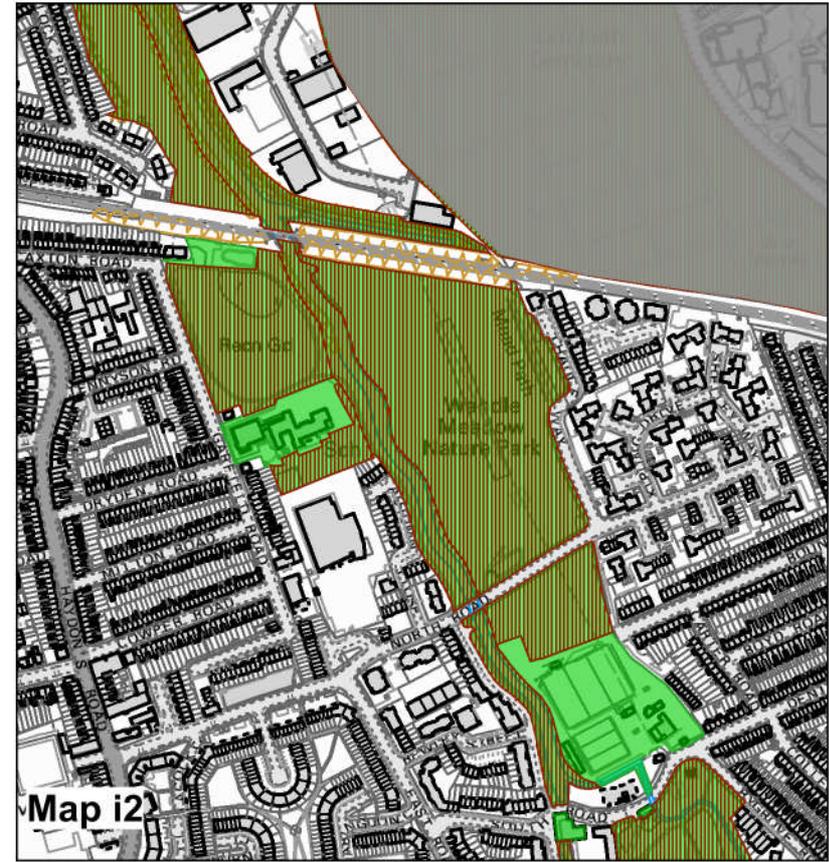
 WVRP Proposed Change  
September 2013



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# Policies Map Submission Draft with recommended changes following Stage 4 responses: Wandle Valley Regional Park

 WVRP Submission Stage 4 July 2013  
 WVRP Proposed Change September 2013



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